DOCUMENT RESUME

ED 190 253 PS 011 629

TITLE Major Factors Inhibit Expansion of the School Breakfast Program.
INSTITUTION Comptroller General of the U.S., Washington, D.C.
REPORT NO CED-80-35
PUB DATE 16 Jun 80
NOTE 78p.
AVAILABLE FROM U.S. General Accounting Office, Distribution Section, Room 1518, 441 G Street, N.W., Washington, DC 20548 (single copy, free). General Accounting Office, Distribution Section, P.O. Box 1020, Washington, DC 20013 (multiple copies, $1.00 each).

EDRS PRICE MF01/PC04 Plus Postage.
DESCRIPTORS *Breakfast Programs: Community Attitudes: *Cost Effectiveness: *Evaluation Needs: *Federal Programs: Financial Problems: Information Needs: Nutrition: Operating Expenses: *Program Implementation: School Responsibility: Social Responsibility: Student Attitudes: *Student Participation

ABSTRACT

Prepared by the General Accounting Office (GAO), this document is a report to Congress on the major factors inhibiting expansion of the School Breakfast Program. Based on information gathered at federal, state, and local district levels the following were identified by the GAO as the major factors retarding expansion of the program: (1) many parents and school administrators believe that serving breakfast is the parents' responsibility: (2) students (especially at the secondary school level) have not accepted the breakfast program as readily as the lunch program: (3) operating and cost problems, such as bus and class schedules, food preparation and serving facilities, and lack of funds for program supervision were apparent: (4) promotion has played a limited role in expansion of the program: and (5) little has been done to inform parents about the program. The GAO recommends that steps should be taken to ensure that parents and school officials are aware of the program, that financial assistance is available and that communities have a voice in decisions to provide a breakfast program in their school district. (Author/MP)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED190253

BY THE COMPTROLLER GENERAL

Report To The Congress

OF THE UNITED STATES

U S DEPARTMENT OF HEALTH
EDUCATION & WELFARE
NATIONAL INSTITUTE OF
EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

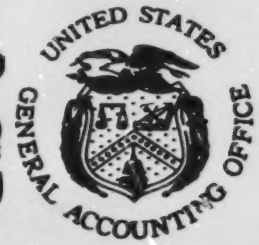
Major Factors Inhibit Expansion Of The School Breakfast Program

Expansion of the Department of Agriculture's School Breakfast Program depends largely on how local people and school officials view the program and the extent of support they are willing to give. Disagreement exists on whether a program is needed in particular schools and on the role of the family versus the schools in providing breakfast.

The lack of information on the nutritional status of children makes it impracticable to determine where a specific nutritional assistance program like the School Breakfast Program might be needed or not needed. Until such nutritional determinations of need can be made, a Federal mandate of the breakfast program--as has been advocated by some in the past--seems inappropriate, especially since other Federal programs provide nutritional assistance to children and others.

GAO believes that steps should be taken to ensure that parents and school officials are aware of the program and the financial assistance available and that communities have a voice in decisions to provide or not provide a breakfast program in their school district. Where support for a breakfast program exists, operational and administrative problems seem solvable, but local financial problems are more difficult to resolve.

PS01629



CED-80-35
JUNE 16, 1980

Single copies of GAO reports are available free of charge. Requests (except by Members of Congress) for additional quantities should be accompanied by payment of $1.00 per copy. (Do not send cash).

Requests for free single copies should be sent to:

U.S. General Accounting Office
Distribution Section, Room 1518
441 G Street, NW
Washington, DC 20548

Requests for multiple copies should be sent with checks or money orders to.

U.S. General Accounting Office
Distribution Section
P.O. Box 1020
Washington, DC 20013

Checks or money orders should be made payable to the U.S. General Accounting Office.

To expedite placing your order, call (202) 275-6241. When ordering by phone or mail, use the report number and date in the lower right corner of the front cover.

GAO reports are now available on microfiche. If such copies will meet your needs, be sure to specify that you want microfiche copies.

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-198282

To the President of the Senate and the
Speaker of the House of Representatives

This report discusses the slow expansion of the School Breakfast Program, efforts by the Congress and the Department of Agriculture to expand it, and the factors impeding its faster growth. The report recommends that the Secretary of Agriculture take several actions to increase program participation and improve nutritional status of school children.

This report is the second and final phase of our response to the January 19, 1978, request of Senators Stennis and Talmadge, the former Senator Eastland, and the late Senator Allen. The first report, "Formulated Grain-Fruit Products: Proposed Restrictions On Use In School Breakfast Program Should Be Reevaluated" (CED-79-12), was issued on December 26, 1978.

We are sending copies of this report to Senators Stennis and Talmadge; the Director, Office of Management and Budget; and the Secretary of Agriculture.

Comptroller General
of the United States

BLANK
AUG 18 1980

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

MAJOR FACTORS INHIBIT EXPANSION OF THE SCHOOL BREAKFAST PROGRAM

D I G E S T

In fiscal year 1979, the Federal Government contributed about $218 million to breakfast programs operating in about one-fourth of the Nation's schools; these 29,876 schools served about 554 million breakfasts. The fiscal year 1979 breakfast program was about 27 percent larger than the 1977 program, but the breakfast program has not grown as quickly as the Congress anticipated. Expansion has been hampered by

--local attitudes toward the program and perceptions of local needs and responsibilities;

--program costs that exceed maximum Federal reimbursement;

--low participation, especially among teenagers;

--operating problems; and

--insufficient and/or misdirected promotion efforts.

Because of slow expansion, legislation was proposed in 1978 to require schools to provide breakfast programs if 50 percent of their students were eligible for free or reduced-price meals. However, the Congress rejected this approach and instead decided to encourage expansion by providing additional financial assistance and by reaffirming its position that programs should be made available in all schools where needed to provide adequate nutrition to students. (See p. 6.) GAO's review supports this basic policy of a voluntary program and suggests that it be continued and encouraged.

PERCEPTIONS OF NEED AFFECT PROGRAM GROWTH

Expansion of the breakfast program depends largely on how local people and school officials view the program and their willingness to support it. (See p. 8.) While most people agree that a good breakfast is important to a child's nutritional well-being, many disagree on the role of the family versus the school in providing children the opportunity to eat breakfast. (See p. 5.)

Program advocates believe the program is needed in many schools because low-income families cannot afford to feed their children, some working mothers leave home too early to prepare a proper breakfast for their children, and other children skip breakfast because they are unaware of its benefits. Others believe, however, that breakfast programs are not needed in their schools because serving breakfast is the parents' responsibility which, where necessary, is adequately supported by Federal programs such as food stamps and aid to families with dependent children. (See p. 5.)

Some districts GAO visited had not initiated breakfast programs because they believe the schools' primary function--educating children--is weakened when they are burdened with what they regard as the duties of parents and other family members. (See p. 12.) The program has grown where State legislatures, school administrators, and parents believe the program improves student attitudes and provides increased energy and motivation for learning. (See p. 8.) In some locations, advocacy groups have been instrumental in convincing parents and local authorities of the need for breakfast programs. (See p. 34.)

Several States have laws requiring certain schools to operate breakfast programs. These laws have resulted in programs being started in some schools that might otherwise not have them; however, in some locations they also have resulted in serious financial problems and in some programs being operated with

few students participating. Some States are weakening or reconsidering their mandates because of the problems encountered. (See p. 6.)

The program's early legislative background directed it toward poor economic areas, but more recent amendments emphasize nutritional need. However, many people continue to view the program as being primarily for children of low-income families and a frequently stated reason for a school's not needing a program was that only a small proportion of such children are in the school. (See p. 8.)

WHICH SCHOOLS NEED BREAKFAST PROGRAMS?

Although the Congress intended the breakfast program to be targeted to the "nutritionally needy," no criteria have been developed for identifying target students or schools except criteria related to family income. With a number of different Federal programs now providing food assistance to low-income families, it may be inaccurate to presume all children from families with incomes below a certain level are nutritionally needy or that their parents do not feed them breakfast.

On the other hand, changes in food technology and students' eating habits are casting some doubt on the assumption that children from middle- and upper-income families are well-nourished. Also, many students, particularly in junior and senior high schools, choose not to participate in available breakfast programs. Low participation raises questions about the need for a program and may raise costs per meal above maximum Federal reimbursement levels.

Present nutritional information systems are not adequate for deciding whether students are nutritionally needy. Although the Congress and the Federal agencies are working toward improved information systems, output from these systems is still years away. (See p. 9.)

COST AND OPERATING PROBLEMS INHIBIT EXPANSION

Financial losses--actual or anticipated--seriously inhibit program growth. Many local officials are reluctant to start breakfast programs or expand existing ones because of the additional cost to the local community. The cost problem is not easily solved.

Often school districts lose money on their breakfast programs--the costs exceed program income from all sources, including Federal reimbursements. Also, most districts incur losses on paid breakfasts because they believe it is not feasible or desirable to charge paying students enough to cover all costs the Government does not reimburse. In addition, some school districts did not receive the maximum allowed Federal reimbursement because the Department of Agriculture's Food and Nutrition Service's regulations had been misinterpreted.

Officials in districts with no breakfast program often cited various operational problems that would need to be overcome before a program could be started. These concerned bus and class schedules, food preparation and serving facilities, and supervision. Except where substantial costs are involved, these problems do not seem to be major barriers to breakfast program expansion because similar problems have been overcome in other school districts with breakfast programs. (See p. 20.)

BETTER PROMOTION IS NEEDED

The Service's public information program for making school administrators and the public more aware of the breakfast program has been ineffective.

Little has been done to inform parents about the program and to solicit their views. In 12 districts without programs that GAO visited, some parents were aware of the program but others were not.

Two States not included in the GAO review (Hawaii and Florida) seem to have found effective methods for obtaining parents' views on whether a program should be started in schools their children attend. Both States reported expansion of the breakfast program as a result.

About a year ago, the Service began a new effort to encourage program expansion. The effort consisted of a publicity campaign, special technical help to selected States, and grants for nutrition education projects. It is too early to tell if this effort will be more effective, but the Service has recognized the need to stay more directly involved in promoting the program. (See p. 31.)

CONCLUSIONS AND RECOMMENDATIONS

The Congress has declined to impose a Federal mandate for school breakfast programs but the question may be raised again. On the basis of GAO's review, it seems that a Federal mandate would be inappropriate. Although the School Breakfast Program is supposed to be targeted to the nutritionally needy, no data or criteria have been developed to determine which children would be affected. When operating costs are a barrier to growth of the breakfast program, the problem is not as readily solvable as some other operating problems. Further, participation in ongoing breakfast programs is low in most cases, even where sizeable numbers of students are from low-income families.

GAO believes the Federal role should be one of ensuring that parents and school officials are aware of the program, its goals, and the degree of support offered by the Federal Government, and that the community has a voice in the decision to provide or not provide a breakfast program at a particular location.

GAO also believes that the Secretary of Agriculture should require each school district, as part of its annual survey to determine which students qualify for free or reduced-price meals, to find out if parents are interested in having their children eat breakfast at school. The school districts should consider

the survey results to decide whether to start a breakfast program.

GAO further believes that the Secretary should, in consultation with the Secretary of Health and Human Services, 1/ require that meaningful criteria be established and information gathered on the nutritional status of school children to provide a sounder basis for administering school food programs. This recommendation is not new but is basically a restatement of recommendations in previous GAO reports and testimony before an appropriations subcommittee. Although the Department of Agriculture and the former Department of Health, Education, and Welfare agreed with GAO's earlier recommendations on the need for nutritional status information to evaluate food assistance programs, their efforts to formulate, coordinate, and implement a national nutrition intelligence system have not as yet produced results. (See p. 38.)

AGENCY COMMENTS

In commenting on a draft of this report, the Department of Agriculture did not take a position on GAO's recommendations. The Department stated that within the past year the Service's policy, planning, and evaluation office had taken major steps to fill the research gaps regarding the school food programs. The Department believed GAO had not given sufficient recognition to these actions. GAO is aware of the Department's ongoing research and agrees that the information obtained should be useful. These efforts relate to nutritional impact and focus on how a particular program affects nutritional status. GAO also believes that more information is needed about the collective impact of all food assistance programs on the nutritional status of children. (See p. 39.)

The Department's comments on other specific issues and GAO's responses are in appendix I.

1/Formerly part of the Department of Health, Education, and Welfare.

Contents

		Page
DIGEST		i
CHAPTER		
1	INTRODUCTION	1
2	PROGRAM PERSPECTIVE	3
	Extent of program expansion	3
	Breakfast at home or in school?	5
3	PERCEPTIONS OF NEED AND RESPONSIBILITY AFFECT PROGRAM GROWTH	8
	School breakfasts viewed as poverty program	8
	Do schools have nutritionally needy students?	9
	Breakfast seen as parents' responsibility	12
	Are children eating breakfast?	13
	Low student participation in breakfast program	17
	Conclusions	19
4	COST AND OPERATING PROBLEMS DISCOURAGE SOME SCHOOL DISTRICTS FROM PROVIDING OR EXPANDING A BREAKFAST PROGRAM	20
	Program costs are not recovered	20
	Operational problems discourage some districts from starting breakfast programs	26
	Conclusions	29
5	GREATER PROGRAM PROMOTION IS NEEDED TO ACHIEVE BREAKFAST PROGRAM EXPANSION	31
	School Breakfast Program promotion played limited role in expansion	31
	Need to inform parents has been recognized but little has been done	33
	Some States have effective methods for obtaining parents' views	35
	Recent Service actions to expand the program	35
	Research on program promotion is in process	37
	Conclusions	37

CHAPTER		Page
6	OVERALL CONCLUSIONS AND RECOMMENDATIONS	38
	Conclusions	38
	Recommendations	39
	Agency comments and our evaluation	39
7	SCOPE OF REVIEW	41
APPENDIX		
I	Letter dated January 2, 1980, from the Administrator, Food and Nutrition Service, Department of Agriculture	44
II	Maximum Federal payments per breakfast for the School Breakfast Program	60
III	October 1978 food service profile of school districts visited	61
IV	Comparison of rate of student participation in the breakfast program with participation in lunch program for school year 1977-78	62
V	School districts' breakfast program costs, revenues, and number of breakfasts served for school year 1977-78	63
VI	School Breakfast Program growth from October 1976 through October 1978	65

ABBREVIATIONS

CBO	Congressional Budget Office
GAO	General Accounting Office
HEW	Department of Health, Education and Welfare
HHS	Department of Health and Human Services
PTA	Parent Teachers Association

CHAPTER 1

INTRODUCTION

At the request of Senators Talmadge and Stennis, former Senator Eastland, and the late Senator Allen, we agreed to review two phases of the School Breakfast Program. The report on the first phase--an evaluation of the Department of Agriculture's proposal to ban the formulated grain-fruit product and milk breakfast--was issued on December 26, 1978. 1/ This report discusses the second phase, a review of the factors affecting expansion of the School Breakfast Program.

The School Breakfast Program, authorized by the Child Nutrition Act of 1966, as amended (42 U.S.C. 1773), is designed to safeguard the health and well-being of the Nation's children and to encourage consumption of nutritious foods. The program is administered by the Food and Nutrition Service, Department of Agriculture, working through State agencies. The program operates in 50 States, the District of Columbia, Puerto Rico, Guam, and American Samoa. The school districts assume the responsibility for program operation at the local level.

The program is supported with funds authorized under the Child Nutrition Act. State agencies give school districts a fixed amount of Federal funds for each breakfast served, with additional payments for breakfasts served to children who receive a free or reduced-price breakfast because their family income is at or below income levels established for the program on the basis of percentages of the federally determined poverty levels. A school can also qualify for further additional payments if it can show severe economic need. Such schools are designated "especially needy." The Service establishes the rates of payment for each type of breakfast on January 1 and July 1 of each year to reflect the Consumer Price Index changes in the cost of food. (See app. II.)

In fiscal year 1979, the Federal Government contributed about $218 million to breakfast programs operating in 29,876 schools. These schools served about 554 million breakfasts. This amounted to a 49-percent increase in participating schools and a 27-percent increase in breakfasts served over

---

1/"Formulated Grain-Fruit Products: Proposed Restrictions On Use In School Breakfast Program Should Be Reevaluated" (CED-79-12, Dec. 26, 1978).

fiscal year 1977. As fiscal year 1979 began, about 23 percent of our Nation's schools were participating in the School Breakfast Program. In these schools about 1 of every 4 students was served breakfast.

CHAPTER 2

PROGRAM PERSPECTIVE

The Congress created the School Breakfast Program because of its concern that the nutritional needs of some children were not being met at home. The breakfast program has not expanded to as many schools as anticipated because some people believe the program is not needed at their schools, some school officials hesitate to tackle operational problems which must be overcome before starting a program, and some school districts do not favor the program because of cost and administrative problems.

EXTENT OF PROGRAM EXPANSION

The School Breakfast Program has expanded although not as much as hoped for. A common yardstick for measuring breakfast program growth has been the school lunch program which began in 1946. As shown below, the number of schools with a lunch program and the number of lunches served far exceed breakfast program participation.

	Breakfast program		Lunch program	
School year	Schools (note a)	Breakfasts served	Schools (note a)	Lunches served
		(millions)		(millions)
1976-77	19,992	396	90,882	4,081
1977-78	21,467	441	92,297	4,111

a/As of October each school year.

Although this measure may have value in determining the extent of School Breakfast Program expansion, it may be unrealistic to expect the breakfast program to achieve the lunch program's wide acceptance because of the basic differences in the operation of these two programs.

Most schools have a practical need to provide a lunch program. At lunch time, students already are away from home, and many schools do not permit students to leave the school area. In many schools, students are long distances away from home and do not have the means or time to return home for lunch. For breakfast, however, students are at home and can either eat there or on their way to school. Another major difference is that the school lunch is designed to provide a service to all students while the breakfast program has from its inception emphasized filling a nutritional need of students from low-income families.

In November 1977, the Food and Nutrition Service mailed questionnaires to 325 schools operating breakfast programs and 325 schools not participating in the program. The responses from officials of the nonparticipating schools showed the following reasons for not having a breakfast program.

Reasons given for not participating	Number of responses received	Percent
The breakfast program is not needed	77	29
Breakfast is the parents' responsibility	41	15
Low participation expected	24	9
Busing limits the time available for breakfast	24	9
Lack of interest	16	6
Inadequate facilities	15	6
Lack of funds	11	4
School board opposition	11	4
Lack of time	10	4
Lack of support from school administration	8	3
Scheduling problems	8	3
No plans for breakfast program	4	2
No information on the program	2	1
Do not know	2	1
Other responses	11	4
	a/ 264	100

a/On 56 of the 312 questionnaires received, there was no reason given, and on 8 questionnaires more than one reason was given.

As shown, many respondents believe the program is not needed at their school and that serving breakfast is the parents' responsibility. In those locations where it is perceived that a breakfast program is not needed, it seems unrealistic to expect program expansion. In addition to a lack of support, the questionnaire responses showed a concern for operational problems. While most operational problems can probably be resolved, lack of funds may be a major barrier to program expansion.

BREAKFAST AT HOME OR IN SCHOOL?

Nutritionists generally agree that a good breakfast is important to a child's nutritional well-being, and some educators have reported improvements in children's behavior and performance after they began eating breakfast regularly. However, disagreement exists as to the proper role of the Government and the schools in assuring children the opportunity to eat breakfast. The issue is: Should breakfast nutrition needs be met at home or in school?

The question of governmental intervention in what has long been considered a parental responsibility--feeding children--is particularly controversial. Some believe the Federal School Breakfast Program encroaches upon this important family responsibility and contributes to family breakdown. They believe that serving breakfast is the parents' responsibility which in cases of economic hardship can be and is supported by Federal programs, such as food stamps and aid to families with dependent children. Others believe, just as strongly, that the Federal Government should intervene in the feeding of children and some believe this intervention should include requiring schools to offer breakfasts to their students. Proponents of the School Breakfast Program say Federal intervention is needed because many low-income families cannot afford to feed their children, some working mothers leave home too early to prepare a proper breakfast for their children, and some children skip breakfast because they do not know the benefits of a good breakfast.

One such advocate, the Children's Foundation, issued a report in November 1978, "Barriers to School Breakfast," which states:

> "There are many reasons children may not be eating a good breakfast at home, or any breakfast at all, for that matter. One is poverty. In 1974, 10.2 million children were members of families living below the Federal poverty line, according to the National Council of Organizations for Children and

Youth. Many of these families and others above the official poverty line can't afford to feed their children properly."

The report recommended that the Congress make the offering of school breakfast mandatory in all schools where 25 percent of the student body, or as many as 100 students, are eligible for free or reduced-price meals. Such eligibility is based on family income.

The Congress has not gone along with either those who think the Federal Government should not sponsor a school breakfast program or those who believe the Federal Government should mandate the program. During consideration of the Child Nutrition Amendments of 1978, the Congress rejected proposals to legislate a mandate for the breakfast program in schools where 50 percent of the students were eligible for free or reduced-price meals. Instead it decided to continue allowing States and school districts to decide who will participate. In passing the 1978 amendments, the Congress encouraged program growth by providing additional financial incentives to States and school districts. Also, the Congress has encouraged broad information programs to make people aware of the program, its benefits, and the extent of Federal support offered.

As of the completion of our fieldwork, five States--New York, Ohio, Michigan, Texas, and Massachusetts--had mandated the breakfast program where certain conditions were present. Three States were included in our review--New York, Ohio, and Michigan. New York required that the program be provided in all schools in cities with a population of at least 125,000. Its five major cities--Yonkers, Syracuse, Buffalo, Rochester, and New York City--were affected. Ohio required it in all schools where at least one-third of the pupils are eligible for a free breakfast. Texas required the School Breakfast Program in schools where 10 percent of the enrollment was eligible for free or reduced-price meals. The Michigan mandate, which went into effect on October 1, 1979, requires the program in all schools where 50 percent or more of the lunches served the previous year were free or reduced-price. Beginning in school year 1980-81, the program will be required in all Michigan schools where 30 percent of the lunches served the previous year were free or reduced-price.

From October 1976 to October 1978, the number of schools participating in school breakfast programs in New York and Ohio increased significantly as shown in the following table. State officials attribute these increases primarily to the mandates.

	Number of schools in the breakfast program	
	October 1976	October 1978
Massachusetts	638	775
New York	860	1,350
Ohio	410	891
Texas	1,244	4,845

In July 1978 Massachusetts passed legislation allowing local school boards to override the mandate. This action was taken primarily because school districts indicated the financial burden was too great. During our review, we noted that one State, South Carolina, had not renewed its State mandate when it expired in June 1976. We were told by the Director of Food Services, South Carolina Department of Education, that financial problems at the district level was the primary reason for not continuing the mandate. Some of the New York and Ohio districts are having similar financial problems as well as problems in getting students to participate in the program. Cost problems are discussed in chapter 4.

- - - -

Breakfast program issues and problems and Agriculture's efforts to promote the program are discussed in succeeding chapters of this report.

CHAPTER 3

PERCEPTIONS OF NEED AND RESPONSIBILITY AFFECT PROGRAM GROWTH

Expansion of the School Breakfast Program depends to a large extent on how the people and school officials at the local level view the program and how much support they are willing to provide. Our review indicated that program growth has been slowed where it is believed little need exists and where serving breakfast is viewed as a family responsibility. On the other hand, the number of schools offering the program has grown where State legislatures, school administrators, and parents believe the program improves student attitudes and provides increased energy and motivation for learning.

In schools offering the program, students have not accepted the breakfast program as easily as the lunch program. The rate of participation in ongoing breakfast programs, especially at the secondary school level, is much lower than the lunch participation rate.

SCHOOL BREAKFASTS VIEWED AS POVERTY PROGRAM

The School Breakfast Program is viewed by most people as primarily directed to children of low-income families. This perception is consistent with the legislative background from the Congress and Agriculture's position on the breakfast program. As part of the Child Nutrition Act of 1966, the Congress initiated the School Breakfast Program and directed the program toward children from poor economic areas. Although the more recent amendments emphasize nutritional need, such need is usually focused on students from low-income families. Agriculture's position on emphasizing economically needy children was stated in its April 1976 report to the Congress:

> "The Department recognizes that this program is not for every school. It has a legislative base that emphasizes needy children and consistent with that intent first consideration for participation should be given to schools serving high percentages of needy children."

Agriculture requested the States to promote the School Breakfast Program for schools drawing attendance from areas of poor economic conditions. The States have given emphasis to such schools to the point where 85 percent of the breakfasts served nationally in the last two school years were

free or reduced-price. This percentage is about twice the rate of free and reduced-price school lunches served.

School officials in 5 of the 12 nonprogram school districts we visited said their districts did not need a breakfast program primarily because of the low percentage of students eligible for free or reduced-price meals. As shown in the following table, at the beginning of school year 1978-79 less than 15 percent of the students in these districts qualified for free or reduced-price meals.

School district	Total enrollment	Eligible students			
		Free	Percent	Reduced price	Percent
Paradise Valley, Arizona	16,811	568	3	378	2
Jamul-Las Flores Union, California	644	61	9	27	4
Parma, Ohio	18,308	1,093	6	542	3
Williamston, Michigan	1,814	120	7	34	2
Central Local, Ohio	1,740	87	5	56	3

The school officials believed that participation would be too low to justify the expenditures of time, money, and effort necessary to operate a school breakfast program. They said that few problems had ever come to their attention regarding hungry children. The officials also told us that teachers and parents had not requested a program. The nutrition chairman of one district's Parent Teachers Association (PTA) told us that the city's 60-member PTA council believed the program was not needed.

DO SCHOOLS HAVE NUTRITIONALLY NEEDY STUDENTS?

Although School Breakfast Program legislation directs the program toward schools where adequate nutrition is needed for its students, neither the congressional legislation nor Agriculture's regulations define adequate nutrition or establish criteria for determining which schools have students who need the nutritional help of the breakfast program.

Nutritional need--An unanswered question

The most widely used measure for deciding whether a school needs a breakfast program has been the number of students that are eligible for free or reduced-price meals--an economic criterion. Proponents of the School Breakfast Program indicated during congressional testimony that children from poor economic areas were considered to be nutritionally needy and that the Secretary was expected to issue regulations requiring breakfast programs in schools that had a number of children from low-income areas.

The Food Stamp Program and the food assistance included in the Aid to Families With Dependent Children Program have generally been justified on the basis that low-income groups lacked the ability to purchase the food necessary for nutritional well-being and therefore had nutritional deficiencies. However, as a nutritional assistance program is added to other existing programs directed toward resolving the same problem, one begins to question whether it is reasonable to continue to say that low-income status is an adequate indication of nutritional deficiency. We have not found sound data to support the broad assumption that children of low-income families generally are nutritionally needy and therefore need the School Breakfast Program.

Agriculture's $12 billion food assistance programs have not been systematically evaluated to determine whether the programs actually are safeguarding or promoting the nutritional health and well-being of program participants--including school children. Although it is generally assumed that these programs offer benefits to their participants, the actual extent to which these benefits further the nutritional well-being of participants is not known.

In several reports, we have called for the evaluation of food assistance programs. In a June 1978 report to the Congress, "Federal Domestic Food Assistance Programs--A Time For Assessment And Change," (CED-78-113, June 13, 1978) we reported on overlaps among Federal food assistance programs. We found that overlaps in these programs could result in some households receiving 230 percent of the amount needed to purchase a thrifty food plan diet (a low-cost food plan Agriculture developed to provide most of the recommended dietary allowances the National Academy of Sciences established). We recommended that, because of this large potential for overlap, an evaluation of all Federal food assistance programs be made.

Because we recognized that the amount of benefits made available to program participants is not necessarily indicative of the amount or type of food purchased and consumed, we also recommended that the Secretaries of Agriculture and Health, Education, and Welfare (HEW) develop and implement ways to measure the nutritional status of Americans and use this data to estimate the nutritional effectiveness of Federal food assistance programs.

In other reports 1/ and in testimony before an appropriations subcommittee in May 1978 and April 1979, we also pointed out the lack of information about the nutritional status of Americans.

In November 1978, we issued a staff study entitled "Future of the National Nutrition Intelligence System" (CED-79-5, Nov. 7, 1978) which stated that the United States does not have a system that provides adequate information on the status of various population groups. Although some nutritional information is supplied through various activities of Agriculture and HEW, the data is often untimely, is not sufficiently specific, omits important population groups, and is inadequate for evaluating program impact. Our report stated that both agencies had taken action to improve their individual surveillance activities and, more importantly, had agreed to create a national nutrition intelligence system to coordinate activities in both agencies. As of November 1979, however, the agencies were still working out the details for implementing the joint system. This means output from improved systems is still years away.

The Congressional Budget Office (CBO) recently analyzed data collected between 1971-74 for HEW's first Health and Nutrition Examination Survey (HANES). According to its draft report, the CBO analysis indicated that the School Breakfast Program was nutritionally more beneficial than other school food assistance programs. CBO noted, however, that this indication should be viewed with extreme caution because of the quality of its information about children participating in the School Breakfast Program. As noted

---

1/"Nationwide Food Consumption Survey: Need for Improvement and Expansion" (CED-77-56, Mar. 25, 1977), "The National School Lunch Program--Is It Working?" (PAD-77-6, July 26, 1977), and "Federal Human Nutrition Research Needs a Coordinated Approach to Advance Nutrition Knowledge" (PSAD-77-156, Mar. 28, 1978).

in this and our previous reports, we believe that domestic food assistance programs require a better basis of nutritional information than is currently available. As described below, Agriculture has initiated efforts, pursuant to Senate Resolution 90, as a start toward obtaining the kinds of information needed to fill the large information void on the nutritional status of children and what impact Federal food assistance programs are having on such status.

Answers are not available for the basic questions about whether Federal welfare and food programs provide sufficient resources to low-income families and whether low-income families should continue to be automatically considered nutritionally needy. Moreover, not very much is known about the nutritional status of children from all income levels who, for whatever reasons, may skip or skimp on breakfast.

Agriculture, in response to Senate Resolution 90 requesting that the agency conduct a study of the school feeding programs administered under the National School Lunch Act and the Child Nutrition Act of 1966, awarded a contract in late September 1979 to a private firm for a study described as being the first effort to assess on a national basis how effective the school breakfast and lunch programs are in promoting children's health and well-being. The study is to focus on children's nutritional status; how well the programs serve needy children; and their effect on children, families, and schools. The final study is due in January 1982. This effort seems to be a good start on developing information on the overall effect of all Federal food assistance programs on participants' nutrient intake and nutritional status. Such information is essential if Federal programs to provide nutritional assistance are to be effectively targeted.

BREAKFAST SEEN AS PARENTS' RESPONSIBILITY

Some districts have not initiated school breakfast programs primarily because many parents and school administrators believe that serving breakfast is the parents' responsibility. They believe the schools' primary function--educating children--is weakened when schools are burdened by attempts to use schools to cure social ills.

In 3 of the 12 nonprogram districts we visited--Utica and Cortland, New York and Grand Rapids, Michigan--the attitude of parents and school administrators was the major factor inhibiting implementation of a breakfast program. Although no specific surveys had been made in either Utica

or Cortland to ascertain community feelings about the breakfast program, most of the parents and school officials we talked with were adamant that breakfast should be served at home. In Grand Rapids, an independent survey 1/ performed for the public school district in school year 1977-78 showed that about 60 percent of the parents said they would not like their children to eat breakfast at school.

Parent members of the executive board of the Utica PTA stated that parents are responsible for feeding their children and that having the school provide breakfast could destroy this sense of responsibility in both the parent and child. A Utica school principal said that the State was trying to take over childraising by requiring schools to assume more and more of the parents' responsibilities.

The Grand Rapids survey illustrates some of the varying opinions about parental responsibility and the School Breakfast Program. While 60 percent of the parents did not want the program, 28 percent of the elementary and junior high students' parents and 37 percent of the senior high students' parents favored a breakfast program. Other results from the survey showed that 40 percent of elementary teachers and administrators cited "breakfast is the parents' responsibility" as the most important factor influencing them against the School Breakfast Program. For junior high schools, the importance of this factor dropped to 33 percent and for senior high schools it was only 21 percent.

ARE CHILDREN EATING BREAKFAST?

Little definitive information is available to show how many students from low-, middle-, or high-income families, for whatever reason, do not eat breakfast or do not eat an adequate breakfast at home and what impact this lack of breakfast has on their nutritional well-being. Estimates of students not eating breakfast range from 5 percent to 27 percent, 2/ with high school students much less likely to eat breakfast than elementary students. Not eating breakfast

---

1/"An Evaluation of the Hot Lunch Program of the Grand Rapids Public Schools," Lee E. Jacokes, Ph. D., and Francene S. Russell, Independent Research Associates, Grand Rapids, Michigan, conducted between Dec. 1977 and Mar. 1978.

2/"Malnutrition, Learning and Behavior", DHEW Publication (NIH) 76-1036; "1977 Minnesota Student Breakfast Survey", Linda Kreismann, Dec. 15, 1978; and "Massachusetts Department of Education, Bureau of Nutrition Education and School Food Service, 1969".

has been attributed to various reasons ranging from not wanting or having time to eat to not having enough food in the house. Insufficient information is available from which to reliably estimate how many students not eating breakfast at home have access to breakfast at school or would eat at school if breakfast were available.

Some recent information about students eating or not eating breakfast is found in studies made in the States of Washington and Minnesota. This information, which may or may not be applicable to other States, is summarized below.

A 1975 Washington State University 1/ evaluation of school lunch and school breakfast programs examined a sample of 728 elementary school children in 29 schools in 18 Washington school districts. Seven of the 29 schools had breakfast programs. The study provided the following information on the breakfast program.

--Eleven percent of the 728 children in the sample came to school without eating breakfast.

--About 7 to 13 percent of the breakfasts served at the 7 schools having breakfast programs supplied a meal where none existed, rather than replaced a meal provided at home.

--The breakfast program significantly increased intakes of vitamin C for participants.

--Children who did not eat breakfast either at home or at school had lower intakes of calcium, phosphorus, thiamin, and riboflavin than children who ate breakfast. (Milk is a good source of all four of these nutrients.)

The study by the Minnesota State Department of Education, 2/ in cooperation with the Minnesota Senate Joint Committee on Nutrition, surveyed approximately 10 percent, or 72,000, of the public school children in grades 1 through

---

1/"Evaluation of School Lunch and Breakfast Programs in the State of Washington," Margaret M. Hard and David W. Price, Sept. 1976.

2/"1977 Minnesota Student Breakfast Survey," Linda Kreismann, Dec. 15, 1978.

12 in October 1977 to determine the number of students who came to school without eating and the reasons for not eating. Questions asked included what type of food items were eaten, whether breakfast was eaten at school, time and means of transportation used to get to school, and some questions relating to attitude toward breakfast. No questions were asked about the amount of food eaten. The foods eaten were categorized by the four major food groups--bread/cereal, milk group, meat/meat alternate, and fruit/vegetable--and compared with Agriculture's school breakfast pattern.

The survey showed that younger students are more likely to eat breakfast than older students and that the adequacy, according to Agriculture standards, of the breakfast eaten decreases as the student gets older. Five to 6 percent of elementary students ate nothing or nothing from the basic four food groups before coming to school. In junior high school, this percentage increased to 11 and jumped to 27 for high school seniors. Likewise, the percentage of students eating from three or all four of the basic food groups decreased from 33 percent in grades 1 through 6 to 22 percent in grade 12.

Most of the students in each grade ate food from at least two of the basic food groups, usually from the bread/cereal and milk groups. In grades 1 through 5, 50 percent of all students ate cold cereal and milk either at home or at school before classes started. This percentage declined as age increased. In grade 12, it was 25 percent.

Of the 6,026 students surveyed who attended schools offering a breakfast program, only 12 percent said they ate breakfast at school. Of those eating at school, 41 percent said they ate foods from three or all of the four basic food groups. This compares with 22 percent of students eating at home. The impact of such eating habits on the nutritional well-being of the students could not be determined since, as stated earlier, no attempt was made to measure the quantity of food eaten.

In addition, the survey showed that the time and method of transportation had little effect on the type of breakfast eaten, but regional differences were apparent. Slightly more students in densely populated areas had little or nothing for breakfast than students in the rest of the State.

Students in the survey were asked to reply yes or no to a series of statements about breakfast not directly related to foods eaten. Some of these statements, shown in the following table, give some insight into why students did not eat breakfast.

Percent of Students in Each Grade Answering Yes to Statements

Statement	Grade									
	3	4	5	6	7	8	9	10	11	12
Usually like to eat	92.8	94.3	94.1	93.3	89.3	86.3	84.5	79.8	77.3	76.0
Parent at home	83.2	81.4	82.4	81.6	85.2	83.5	84.4	82.6	81.9	81.3
Family usually does not eat	30.2	25.6	20.2	17.7	15.8	15.8	15.3	16.5	15.9	15.2
Up too late to eat	8.5	7.4	5.4	4.7	8.2	8.3	8.8	11.1	13.4	13.4
Skipping okay	16.4	15.6	12.4	12.1	18.0	20.5	22.8	26.9	28.9	31.7
Nothing I wanted	19.4	15.0	11.1	9.8	9.9	10.8	10.5	11.7	13.7	12.8
Losing weight	6.4	4.8	3.0	3.0	3.8	5.4	6.6	8.2	9.3	10.2
No time	15.4	13.0	9.8	8.3	11.1	11.2	11.3	14.5	16.4	17.1
Not hungry	10.7	8.3	7.7	7.1	9.7	11.9	13.2	16.1	18.9	20.7
Too lazy	11.3	8.6	5.4	4.9	5.1	5.5	6.1	6.5	8.3	8.7
Not feeling well	19.2	15.1	11.8	11.1	10.6	9.3	9.2	9.2	9.4	9.6

16

The answers given indicate that students find breakfast less desirable as they grow older. Also, as students grow older they are more inclined to believe that skipping breakfast is an acceptable practice. It would seem that nutrition education is not keeping pace with the growing child who is less likely, as he or she grows older, to follow the generally accepted premise that breakfast is an important factor for nutritional well-being. This is further supported by the information showing that 8 to 10 percent of high school students did not eat breakfast because they were trying to lose weight.

While 15 to 18 percent of the students indicated that their parents were not home when they left for school, no information was presented to show any causal relationship of this absence to not eating breakfast.

LOW STUDENT PARTICIPATION 1/ IN BREAKFAST PROGRAM

The breakfast program has not gained as much student acceptance as the lunch program. Consequently, participation in the breakfast program is significantly lower than in the lunch program and falls off sharply at the senior high school level. Students, for a variety of reasons, choose not to participate in the breakfast program, and school administrators cite low student participation as one of the primary reasons for not offering the School Breakfast Program in junior and senior high schools. As discussed in chapter 4, low participation can increase the per meal cost which could result in financial losses to local school districts.

In school year 1977-78, the breakfast program was offered in 15 of the school districts we reviewed. Our analysis of student participation showed a much lower rate of participation by junior and senior high school students. (See app. IV.)

Only 5 of the 15 school districts served both breakfast and lunch at the elementary, junior high, and senior high schools. As shown in the table on page 18, elementary and secondary students participate in the lunch program at a much higher rate than in the breakfast program.

1/Participation is computed by dividing the average number of meals served per day by the average daily attendance. The average number of meals is the total number of meals served during the school year divided by the total number of days that meals were served.

School year 1977-78

School district	Elementary school		Junior high school		Senior high school	
	Breakfast	Lunch	Breakfast	Lunch	Breakfast	Lunch
	(participation percent)					
Biloxi, Mississippi	39	85	24	62	11	46
Gallia County, Ohio	29	67	(a)	(a)	6	83
Lorain, Ohio	43	79	7	35	0.2	52
Corning, New York	12	70	5	66	3	42
Emery, California	38	93	(a)	(a)	15	23

a/District does not keep separate records for junior high students; participation statistics are combined with the senior high students.

Our discussions with more than 500 students in 26 schools that had a breakfast program showed that the primary reasons for students not participating in the breakfast program are:

--They prefer to eat at home or on their way to school.

--They prefer to socialize rather than participate.

--They choose to arrive at school after the breakfast period.

--Their parents prefer to have them eat at home.

The independent survey performed for the Grand Rapids public schools (see p. 13) confirms that students, as they advance to higher grades, have less desire to eat breakfast at school. As part of that survey, students were asked if they would eat breakfast at school if it was offered. Their responses by grade level follow:

Student grade level	Percent of students' responses		
	Yes	No	Undecided
Elementary	65	25	10
Junior high	29	44	27
Senior high	20	54	26

High school principals we talked with believed that many students drive to school and choose to arrive just before class starts--missing the breakfast period. Others prefer to get a quick bite to eat at a local restaurant or prefer socializing before class. The principals believed the School Breakfast Program would not be successful in secondary schools because of low student participation.

CONCLUSIONS

The School Breakfast Program is not as widely accepted as the school lunch program. Generally, its acceptance is based on people's attitudes about parental responsibilities and perceptions regarding children's need for the program's nutritional help. The potential for breakfast program expansion exists where a community (parents, students, and school officials) strongly believes the program is needed. Also, based on the available information regarding student participation choices, significant expansion of the breakfast program in the secondary schools seems unlikely.

Although better efforts to obtain nutritional information are being initiated, there is currently an information void regarding the nutritional status of children and what impact Federal programs are having on such status. Until the breakfast program is better related to meaningful information on the nutritional needs of school children, a Federal program mandate seems inappropriate.

CHAPTER 4

COST AND OPERATING PROBLEMS DISCOURAGE SOME SCHOOL DISTRICTS FROM PROVIDING OR EXPANDING A BREAKFAST PROGRAM

School districts providing a breakfast program often find that program revenues, including Federal reimbursements, are not enough to cover total program costs. The need to contribute local funds to make up the difference can be a major barrier to expanding the breakfast program. Some districts have refused to expand their programs to other schools and other districts have dropped the program from some schools in the face of financial losses. Some districts without a program are unwilling to start one unless it will be self-supporting.

In addition to cost problems, officials in nonprogram districts often cite operational problems that must be overcome before a program can be started. These problems concern bus and class schedules, food preparation and serving facilities, and program supervision. Problems in these areas do not seem to be a major barrier to breakfast program expansion since similar problems have been overcome by school districts with ongoing breakfast programs. Cost problems, however, appear to be more difficult to resolve.

PROGRAM COSTS ARE NOT RECOVERED

The Federal Government and some State governments provide funding for school districts' breakfast programs. Also, some students are charged full or reduced prices for their breakfasts. Federal reimbursement is based on the number of free, reduced-price, and paid breakfasts served. Free and reduced-price meals are made available to students from low-income families and the paid breakfast is made available to all other students. Students receiving free breakfasts pay no fee, those receiving reduced-price breakfasts usually pay 10 cents, and those paying for breakfast are charged a fee established by the district.

Many school districts lose money on their breakfast programs because total breakfast cost exceeds breakfast income from all sources. The cost per breakfast often exceeds even the maximum Federal reimbursement for serving a free breakfast. Also, most districts incur a loss on paid breakfasts served because they do not believe it is feasible to charge paying students enough to cover costs the Federal Government does not reimburse. Moreover, some school

districts have not received the maximum allowed Federal assistance because the Food and Nutrition Service's regulations have been misinterpreted. Cost problems have been serious impediments to school districts considering initiating or expanding school breakfast programs.

The Service establishes maximum Federal reimbursement rates for each type breakfast and adjusts the rates each 6 months to reflect changes in the Consumer Price Index. Recent rates are shown in appendix II. For the last 6 months of school year 1977-78, the maximum regular Federal reimbursement breakfast rates were 40.25 cents for a free breakfast, 33.25 cents for a reduced-price breakfast, and 11.5 cents for a paid breakfast. The Service established higher rates--50.25 cents for free and 45.25 cents for reduced-price breakfasts--for especially needy schools who serve a high percentage of free and reduced-price meals and are unable to do so within the regular Federal reimbursement rates. Especially needy schools also receive 11.5 cents for a paid breakfast.

Eleven of the 15 school districts we reviewed that offered a breakfast program in school year 1977-78 lost money on their breakfast programs. (See app. V.) As shown in the table below, breakfast costs in 8 of the 11 districts exceeded the amount allowed for a free breakfast even at the especially needy rate--the maximum Federal subsidy for a school breakfast.

	Average 1977-78 cost per breakfast			
School district	Food	Nonfood	Total	Loss per breakfast
Cleveland, Ohio	$0.2790	$0.2264	$0.5054	$0.0457
Gallia County, Ohio	.2860	.2249	.5109	.1138
Baldwin Community, Michigan	.2471	.2619	.5090	.0589
Long Beach, California	.2576	.3501	.6077	.0622
Emery, California	.3034	.5573	.8607	.4144
Tucson, Arizona	.1640	.3692	.5332	.1279
Corning, New York	.2435	.3875	.6310	.1413
New York City No. 78, New York	.2599	.2927	.5526	.0452

The high cost of nonfood items, such as direct labor, purchased services, equipment, and indirect costs, seems to be a major contributor to breakfast program losses. The above table shows that four of the eight school districts had nonfood costs exceeding 35 cents per breakfast.

Another factor that seems to play a part in high per breakfast cost is low student participation. The benefits of a high-volume operation (where fixed costs are distributed over many breakfasts) cannot be effectively achieved if participation is low. Participation of junior and senior high school students in the five districts--Gallia County, Emery, Corning, Tucson, and New York City No. 78--that offered a program at those grade levels was extremely low, ranging from 2 percent to 15 percent. In elementary schools, participation ranged from 12 percent at Corning, 29 percent in Gallia County, and 32 percent in Long Beach to 76 percent in Cleveland and 77 percent in Baldwin Community.

In all 11 districts that had losses, the amounts charged paying students were not enough to cover the difference between breakfast cost and Federal reimbursement for paid breakfasts. In the Corning, New York school district, for example, only 27 percent of the breakfasts served in school year 1977-78 were paid breakfasts, but 60 percent of the district's loss was incurred on paid breakfasts. The loss for each type breakfast is shown in the following table.

Loss per Breakfast in Corning, New York, in School Year 1977-78

	Paid breakfast	Reduced-price breakfast	Free breakfast
Cost per breakfast	$0.6310	$0.6310	$0.6310
Revenues received			
Federal	$0.1142	$0.4178	$0.4775
State	.0025	.0305	.0759
Students	.2000	.1000	0
Total revenue (note a)	$ .3167	$0.5483	$0.5534
Gain or loss per breakfast	($0.3143)	($0.0827)	($0.0776)

a/The State of New York provides up to $0.12 for reduced-price, $0.11 for free, and $0.0025 for paid breakfasts in addition to the Federal reimbursement, not to exceed cost. In reimbursing school districts, however, the State limits labor costs to 45 percent of total costs. This affects both Federal and State reimbursements.

The Corning school district food director told us the paid breakfast price was not increased because she thought it would cause some students to drop out. For example, she said the lunch price to the paying students was increased 10 cents and student participation dropped 10 percent. Participation decreases tend to drive the per breakfast cost even higher.

Two studies sponsored by the Service also showed participation declined as the price of meals served to paying students increased. One study 1/ performed in Fairfax County, Virginia, and completed in July 1976 showed a 9-percent decline in lunch participation and a 13-percent decline in breakfast participation when prices were increased 10 cents for meals served to students paying full price. The other study 2/ performed by Washington State University and completed in September 1976 covered 18 school districts and showed a 6-percent drop in student participation when the price of a lunch served to paying students was increased 5 cents.

Service regulations have contributed to cost problems

Some of the program cost problems school districts experienced were related to the difficulties State agencies and school districts encountered in interpreting and applying the Service's regulations pertaining to especially needy schools and breakfast reimbursement. The differing interpretations may have resulted in some school districts receiving reimbursement at levels other than those to which they were entitled under the regulations.

For example, the State of Ohio's interpretation of how breakfast revenues should be treated in calculating maximum Federal reimbursement per meal resulted in some districts being underpaid for their breakfast programs. Also, Ohio's election to compute reimbursement on a monthly basis with no adjustment to even out monthly variations in breakfast costs resulted in additional underpayments in some cases. In Cleveland, Ohio, the school district received about $48,000 less for school year 1977-78 than it could have under the regulations.

1/"Impact of Price Increase on School Lunch and Breakfast Program Participation--Fairfax County, Virginia," FNS, July 1976.

2/"Evaluation of School Lunch and Breakfast Programs in the State of Washington," Margaret M. Hard and David W. Price, Sept. 1976.

Service regulations permitted a State to declare a school especially needy and receive a higher rate of reimbursement for the breakfasts served if the school was financially unable to provide free and reduced-price breakfasts at the regular Federal reimbursement rates. One of the criteria for determining such financial inability was "unusual costs required to provide a breakfast in the school in spite of the observance of good management practices." In Ohio, the criteria was not used because the food service director thought it almost impossible to make a determination that good management practices had been observed. However, New York's Bureau of School Food Management Chief, using his judgment, made such determinations on a monthly basis.

Service regulations also provided that especially needy be determined on a school-by-school basis. We found, however, that one school district we reviewed determined such eligibility on a district basis thereby increasing the amount of Federal reimbursement for its breakfast program. In September 1978, the Service issued a special instruction permitting districts in which the average district breakfast cost was in excess of regular reimbursement rates to designate all schools in the district as especially needy.

The problems of determining which schools are eligible for especially needy funding have been resolved by the Child Nutrition Amendments of 1978 (Public Law 95-627) and the Service's regulations issued August 17, 1979, to implement the law. The law and regulations provide that schools will be declared especially needy if 40 percent or more of the lunches served under the lunch program are provided at free or reduced prices or if the State law requires the school to offer a breakfast program. The other criteria pertaining to financial hardship have been deleted.

In a January 26, 1979, news release, the Assistant Secretary for Food and Consumer Services, Department of Agriculture, stated:

> "A clear definition of severe need will make it easier for states to expand the number of schools that serve breakfast, and will help us administer benefits fairly and efficiently."

These proposed regulations do not address the 1978 amendment provision that schools do not have to keep separate records for breakfast and lunch program costs. This provision will be addressed in a separate proposed regulation. The Service is considering developing a formula to facilitate cost determinations between the two programs.

Schools dropped or not added due to lack of funds

Several of the school districts losing money on their breakfast programs took actions to reduce or minimize their losses by dropping the program in some schools or not expanding the program to other schools. Also, officials in 6 of the 12 nonprogram districts we reviewed told us they would not start a program unless it would be self-sufficient.

In the Corning, New York, school district, the breakfast program was dropped in eight schools in school year 1978-79 because of low participation and high costs. Participation dropped from 14 percent in school year 1976-77 to 8 percent in school year 1977-78. As participation dropped, the program cost was spread over fewer meals and the district lost $10,300 in school year 1977-78.

In Emery, California, the school district decided to discontinue the breakfast program after June 1979 because of high program costs and losses being incurred. The district lost about 41 cents on each breakfast in school year 1977-78.

Expansion of the breakfast program in the Cleveland, Ohio, school district did not take place, even though mandated, because of the district's financial problems. The district provided the program in 55 of its 177 schools in school year 1977-78 and had planned to expand to all district schools by September 1978. In school year 1977-78, the district transferred over $2 million from its general fund to cover food program losses. According to State records, about $109,000 of this loss was incurred on the breakfast program. The State of Ohio has granted the district more time to comply with the mandate because funds were not available to support the additional costs to the district that would result from expansion.

Long Beach, California, and Tucson, Arizona, school district officials told us the program would not be expanded to any schools not qualified for especially needy funding. They said the higher reimbursement per breakfast was needed to minimize program losses and provide quality breakfasts.

OPERATIONAL PROBLEMS DISCOURAGE SOME DISTRICTS FROM STARTING BREAKFAST PROGRAMS

Officials in school districts that do not offer a breakfast program often cite operational problems (as well as cost problems) that must be overcome before a program can be started. Often, more than one problem is cited as a reason for not having a breakfast program. The major operational problems mentioned are:

--The difficulty involved in changing bus and class schedules so that students can eat breakfast before classes.

--The lack of food preparation and serving facilities in schools that have not been constructed to accommodate food programs.

--The lack of funds for program supervision and the reduction in quality of education if teachers were used for supervision.

School districts that provide the breakfast program have overcome similar problems and concerns. If cost problems can be resolved, operational problems appear to be solvable where the breakfast program has broad support or is required by a State. A discussion of the school districts' operational problems follows.

Busing seen as problem by some but not by others

Busing problems perceived by districts not providing a breakfast program are generally no more complex than those solved by districts providing breakfasts. District officials usually can resolve busing problems by making changes to bus or class schedules, or both, to provide students with enough time to eat breakfast at school. Such changes, however, directly benefit only those who participate in the breakfast program and could greatly inconvenience other students and their families.

In this connection, we noted that participation generally was low in the ongoing breakfast programs, especially in the secondary schools. (See app. IV.) This was true for districts with large numbers of students eligible for free and reduced-price meals as well as those with small numbers. Consequently, most students, their parents, and some district staff may be inconvenienced or incur hardships because of changes to bus or class schedules. Earlier buses mean

getting up earlier and, for students not eating breakfast at school, a longer wait for classes to start.

Bus scheduling was cited by 2 of the 12 nonprogram districts we reviewed as the primary reason for not having a breakfast program. Officials in these two districts--Littleton, Arizona, and Hattiesburg, Mississippi--thought that some students bused to schools arrived too late to participate.

In Littleton, Arizona, about 86 percent of the 1,290 students are bused to two schools and arrive at different times prior to the 8:30 a.m. start of classes because buses are required to make several trips. The earliest bus arrived at 7:35 a.m.--55 minutes before classes started--and the latest buses arrived at 8:17 a.m.--13 minutes before classes. The District Superintendent believed 13 minutes was insufficient time for serving breakfast. He had considered moving the bus schedule pickup time 20 minutes earlier on two buses or purchasing two additional buses and hiring two more drivers. He said these solutions were unacceptable because the district could not afford new buses and drivers and moving the bus schedules 20 minutes earlier would result in some students waiting in the dark in the winter and arriving at school over an hour before classes.

In Hattiesburg, Mississippi, about 42 percent of the 5,900 students are bused to 15 schools. The Hattiesburg district does not have its own buses but has contracted with the county school district for busing its students. Hattiesburg school officials believe there is insufficient time for a breakfast program since the students arrive at school 5 to 20 minutes before classes start. Since Hattiesburg students are bused after the county students, Hattiesburg district officials believe that a rearrangement of bus schedules to accommodate a breakfast program is impracticable.

In four other school districts where officials believed a breakfast program was not necessary because few students were eligible for free or reduced-price meals, officials told us busing would be a problem if a breakfast program was started. Some thought additional funds would be required, while others cited the inconvenience to the majority of the students not wishing to participate.

Whether busing problems can be resolved appears to depend on the willingness of district officials, parents, and students to accept being inconvenienced. Sixteen of the 17 school districts we reviewed that had a breakfast program bused students to schools. In Apache Junction, Arizona, for example, about 52 percent of the 1,980 students are bused.

To get students to school on time for the breakfast program, an official told us the first bus runs were scheduled 10 minutes earlier and the starting time for elementary school was delayed 5 minutes. In Gallia County, Ohio, bus schedules were moved up 30 minutes and bus drivers and cooks started work earlier.

Lack of facilities--A problem for some districts but not for most

Many of the districts included in our review had schools that were constructed without adequate facilities to accommodate food programs. However, in one way or another all 29 of these districts provided lunch programs for their students. Where facilities were lacking, food was usually prepared in a central kitchen, transported to individual schools, and/or served in the gymnasium, classrooms, or hallways.

A common facilities problem cited by some districts not offering a breakfast program had to do with the lack of adequate meal-serving areas and the difficulty they would have in cleaning up multipurpose areas (such as cafeterias used for classrooms and school hallways) in time for classes to start in the morning. However, these same problems were being coped with for the school lunch program in these districts and seemingly could be handled for the breakfast program.

For example, an elementary school in Lorain, Ohio, overcame the lack of preparation facilities by serving a cold breakfast. To overcome the lack of a cafeteria, breakfast serving carts were delivered to each classroom before classes started. The students ate breakfast in the classroom and cleaned up their room after eating. Students in some New York City District No. 2 and Cleveland, Ohio, schools also are served breakfast in their classrooms.

A school in New York City District No. 78 serves breakfast in the school lobby. Breakfast had been served in the sixth floor cafeteria, but officials told us students considered the cafeteria inconvenient. Since the serving area was moved to the lobby, student participation in the breakfast program increased from 25 students a day to an average of 369 students a day in school year 1977-78.

Supervision problems can be resolved

None of the 12 school districts we reviewed that did not provide a breakfast program cited supervision problems as the primary reason for not having a program. However, officials

in seven of the districts told us that the problem of obtaining and paying for program supervisors needed to be overcome before a breakfast program could be started. Many of these officials were unaware that teachers' and aides' salaries attributable to a breakfast program could be claimed as a program expense within the Federal reimbursement rates. Some officials also expressed concern that using teachers to supervise a breakfast program would diminish the quality of education because time spent on supervision would reduce the time spent for class preparation or student counseling.

In the 17 districts that provided a breakfast program, similar problems and concerns had been overcome. Generally, the reimbursement problem was resolved with an understanding of the Federal regulations, or, where doubt existed, obtaining an interpretation of the regulations. Cost of supervision however could be a major problem if Federal reimbursement already is at the maximum rate. Eleven of the 15 school districts that offered the breakfast program in school year 1977-78 lost money on the program and were required to contribute local funds to make up for the loss.

The decision to use or not use teachers for program supervision varies among schools and districts. In Biloxi, Mississippi, one school principal permits teachers who come in early to supervise breakfast to leave early. Another principal rotates a series of early morning duties among the teachers. In New York District No. 2, program supervision is considered to be a legitimate part of the school's daily schedule and, in Baldwin Community, Michigan, the district hired breakfast program aides to supervise the program. Some supervision is also provided voluntarily by teachers and principals.

CONCLUSIONS

The cost of providing a breakfast program has a definite effect on the potential for program expansion. Most districts are required to contribute some of their own funds to pay for a breakfast program because the Federal reimbursement does not always cover the cost of free and reduced-price breakfasts. The option of increasing the charge to paying students is not considered feasible by most districts since it would tend to drive paying students from the program and cause the cost per breakfast to increase. It would also tend to give the program the appearance of being exclusively for students from low-income families. This could cause a further drop in participation because students might choose not to participate rather than be labeled low-income. Because of the difficulty in overcoming cost problems, we believe that expansion of the School Breakfast Program

depends in large part on communities being willing to provide financial support to have a program in their districts.

Operational problems are usually solvable if the breakfast program has community support. Where strong support is absent, any solutions to busing, facilities, or supervision problems will meet with resistance. This is especially true if solutions such as changing bus and class schedules inconvenience those parents and students who do not plan to participate in the breakfast program.

CHAPTER 5

GREATER PROGRAM PROMOTION IS NEEDED TO ACHIEVE BREAKFAST PROGRAM EXPANSION

The Congress, recognizing that expansion of the breakfast program depends on making school administrators and the public more aware of the program, directed the Food and Nutrition Service in October 1975 to start a public information program. The Service's program has consisted primarily of providing materials to State agencies and having the agencies inform schools and the public of the benefits of the breakfast program. This program has generally been ineffective. Only one of the six States included in our review actively promoted the program and only 2 of the 17 districts offering the program attributed its initiation or expansion to Service or State promotional activities.

Little has been done to inform parents at the school level about the breakfast program. In the 12 nonprogram districts, some parents were aware of the program but others were not and therefore could not reasonably be expected to decide whether they were for or against having a breakfast program in their schools. Two States not included in our review seem to have found effective methods of obtaining parents' views on whether a program should be started in schools their children attend. Also, some advocacy groups have helped to publicize the program.

It is apparent that the Congress would like to see a voluntary program where need exists. Therefore, the Service's role should be to ensure that parents and school officials are aware of the program, the intent of the program, the extent of Federal support, and the benefits of a good breakfast (whether at home or at school) on the nutritional well-being and learning capabilities of children. Such information is necessary if people at the local level are to logically determine whether a school breakfast program should be initiated in their schools. The Service initiated several actions in November 1978 to strengthen its information program. In addition, as discussed in the latter part of this chapter, the Service has initiated some School Breakfast Program research projects.

SCHOOL BREAKFAST PROGRAM PROMOTION PLAYED LIMITED ROLE IN EXPANSION

In April 1976, as required by the National School Lunch Act and Child Nutrition Act of 1966 Amendments of 1975 (42 U.S.C. 1773), the Service issued a report to the Congress

outlining an information program plan intended to make school districts and the public aware of the School Breakfast Program. Under this plan, the Service was to develop promotional material which State agencies would distribute to the school districts. The Service's plan also provided for taking actions to make the public more aware of the breakfast program and approving State agency plans for publicizing the program. This program, started in fiscal year 1976, has had very limited impact.

Essentially, the Service relied on State agencies to inform school districts of the breakfast program and in most States this was not done. The Service developed promotional material which was distributed to State agencies and approved State promotion plans. However, only one of the six States we reviewed--Arizona--made significant efforts to promote the program at the school district level. In the other five States, we found only limited use of the materials and the plans were not fully carried out. Officials told us that this was primarily because of staff shortages.

Arizona was the most active of the six States in promoting the program. Arizona sent school administrators several memorandums promoting the program, citing the nutritional benefits of breakfast, and requested them to contact the State agency on a toll-free telephone line to obtain information on implementing the program. The State informed school administrators of reimbursement rates, cost allocation methods, and alternative cost accounting procedures. Arizona also promoted the program at various gatherings and meetings, such as education fairs, food service director meetings, and State-sponsored meetings held in different parts of the State. Officials of the five Arizona school districts included in our review generally believed that the State had actively promoted the program. District officials recalled receiving promotional materials and having program discussions with State officials.

The efforts of the other five States in our review were less extensive and were characterized by a lack of staff to carry out program promotions. In some States, these efforts were also limited because of factors such as State emphasis on the lunch program and a mandated breakfast program, and a belief that a hard sell is not the proper approach to achieve expansion.

California promoted the program through State bulletins, newsletters, and visits by State consultants to schools. In school year 1977-78, State consultants planned to make 1,338 visits but due to a stated shortage of staff made only 512 visits. A lack of staff was cited as the reason for not

carrying out planned activities in New York and Michigan. In Ohio, the State food service director told us his efforts were directed primarily to providing help to districts where the breakfast program has been mandated. Mississippi outreach activities consisted of publishing articles in its Food Service Newsletter and the annual meetings of its area supervisors with representatives from each school district. These meetings concerned all food programs, including school breakfast. Mississippi's approach was to make districts aware of the program, but not to use a hard sell.

Overall, State promotional efforts seem to have had a limited effect on program expansion. At the time of our review, programs had been started in the last 3 years in six of the districts included in our review and expansion had been achieved in seven others. (See app. VI.) Of these, only two districts--Bisbee and Apache Junction, Arizona--attributed their programs to State promotion efforts. Even though Arizona's promotional effort had influenced starting programs in these two districts, the food service director of the Tucson school district believed the Arizona outreach effort could be improved. He thought the effort had high visibility at the State and national levels but was poorly designed and inadequate for reaching the school districts. He believed more face-to-face contact was needed between Service and State officials and school district officials so that promotions could be designed to fit the districts.

NEED TO INFORM PARENTS HAS BEEN RECOGNIZED BUT LITTLE HAS BEEN DONE

Although Service and State officials recognized the importance of informing school district officials about the breakfast program, many believed program expansion could best be achieved by generating parent awareness and support for the program. Information from the 12 nonprogram districts included in our review supports this view. School administrators of 10 of the 12 districts told us that parents had not expressed a desire for a breakfast program, and 5 of the 12 told us they would not establish a program unless parents clearly expressed such a desire.

Neither the Service nor the six States that we reviewed did much to assure that the public was aware of the benefits of breakfasts and the extent of Federal support for a school breakfast program.

The Service's information plan and the implementing plans of the six States we reviewed listed numerous actions that were to be taken to make the public more aware of the

School Breakfast Program. However, very few of these actions were carried out. The Service provided the most extensive effort by distributing program promotion spots to 5,800 radio and 700 television stations before the start of the 1976-77 school year. No followup was made; and Service officials did not know how many stations actually used the spots, how often they were used, or if they were effective.

Although we could not assess whether few or many parents in the 12 nonprogram districts were fully aware of the School Breakfast Program, we obtained information which indicated some were unaware of the program and others had some knowledge of the program. For example, in Greenville, Mississippi, two PTA presidents told us most parents in the district were not aware that a School Breakfast Program could be implemented. They said the program had not been discussed at PTA meetings and they believed parents had not discussed the program with principals or other school officials. A member of the Parents Advisory Committee in Williamston, Michigan commented that most parents in the district probably were not familiar with the program and that the committee had not discussed a breakfast program with school officials. In Utica, New York, and Parma, Ohio, parents we talked to were aware of the program.

In some States, advocacy groups have initiated actions to make parents aware of the program. California State officials told us, for example, that advocacy groups were a major factor in getting breakfast programs started in several school districts in that State. Also, the program has expanded in Detroit, Michigan, largely as the result of advocacy groups' efforts.

None of the 17 districts offering a breakfast program in some of their schools made any promotional effort to inform parents of students in nonparticipating schools about the breakfast program. District efforts primarily were directed toward students and parents of schools serving breakfast in an effort to increase student participation in the program.

We found only one instance--Tucson, Arizona--in the 17 districts where the breakfast program expanded to other schools as a result of parental action. The Tucson food service director told us that parents from two schools became aware that breakfasts were being provided in other Tucson schools and encouraged their principals to initiate breakfast programs in their schools. The director told us he does not actively promote the program but usually will provide a

program to a school if requested by the principal. He believes a school principal must be committed to the program to obtain sufficient student participation to cover program costs.

SOME STATES HAVE EFFECTIVE METHODS FOR OBTAINING PARENTS' VIEWS

Information at the Service's regional offices we visited showed that two States not included in our review--Hawaii and Florida--had programs to routinely determine parental interest in a school breakfast program.

In Hawaii, as a result of a court action initiated by an advocacy group, the State annually surveys parents of nonprogram schools to determine their interest in the breakfast program. A breakfast program is to be provided in a school if the program is favored by 10 percent of the parents or 45 parents (whichever is smaller). In November 1977, 87 of Hawaii's 223 schools were not participating in the program because of parents' lack of interest. By October 1978, only 70 schools were not participating in the breakfast program.

Florida requires a similar annual survey. The State requires each school district to survey the parents of students in schools not having a breakfast program to get their opinions on whether a program should be established. Survey forms are sent to all parents along with the annual questionnaire concerning eligibility for free or reduced-price meals. Survey results are compiled and the superintendent of schools submits the results to the school board at a public meeting. After consideration of the survey results and public discussion, the school board decides whether to start the program in individual schools. Florida added 101 schools to its breakfast program between September 1978 and December 1978. The administrator of Florida's Food and Nutrition Management Section attributes 80 percent of this increase to the parent survey.

RECENT SERVICE ACTIONS TO EXPAND THE PROGRAM

Department of Agriculture officials have recognized that their prior efforts to promote the program were unsuccessful and that more must be done to inform parents and school officials about the program. To encourage program expansion, the Service in November 1978 began the following three-phased effort.

1. Start a national publicity campaign using the media and developing new outreach information to raise the visibility of the program.

As part of this effort, the Service mailed letters and promotional materials to 1,006 community service groups and parent and teacher organizations in December 1978. The letter stated in part,

> "Congress has expressed concern that relatively few schools, compared to the total number participating nationwide in the National School Lunch Program, currently offer the School Breakfast Program. Therefore, the Department is planning a massive public information effort aimed toward expansion of the Program. We urgently need your help and that of the entire membership of your organization in this effort. Could you* * *would you help us get the Breakfast message across the land?"

The Service, in June 1979, also mailed promotional material to about 100 professional organizations with interests related to breakfast products and urged them to actively support the School Breakfast Program. A Service official said that some offers of help have been received but it is too early to evaluate the effectiveness of these efforts in expanding the program.

2. Give special attention and help to selected States in each region to get the breakfast program started in more schools.

The regional offices have selected 19 States, and regional staffs are offering technical and promotional help to State agencies to help get breakfast programs started. The technical help includes advice on regulation requirements and making sure district officials understand what program expenses the Federal reimbursement covers. This special assistance program is directed toward resolving problems like those discussed in chapter 4.

3. Issue grants to public and private nonprofit groups, universities, and State governmental agencies for nutrition education and development projects.

In September 1979, the Service announced it was making grants to six nonprofit organizations to expand participation in the School Breakfast Program. Through use of these grants, the Service is seeking innovative programs to increase the number of schools participating in the School Breakfast Program and to increase participation of students in schools with ongoing programs. These efforts might also develop more effective ways to teach children the advantages

of eating a well-balanced breakfast. The Service's expanded version of its efforts in this regard is shown in its comments on pages 53 through 57 in appendix I.

RESEARCH ON PROGRAM PROMOTION IS IN PROCESS

The Service's report to the Congress in April 1976 (see p. 31) concerning a school breakfast information program included plans for completing in fiscal year 1977 an evaluation of the School Breakfast Program's participation, its nutritional impact, and its cost. The second and third phases are in process; the first was just recently completed.

To accomplish the first phase of the evaluation, assessing the status of the program and determining the type of schools participating in the program, the Service mailed questionnaires in November 1977 to 325 schools operating breakfast programs and 325 schools not participating in the program. The Service's Office of Policy, Planning and Evaluation issued a report on this phase in April 1980 assessing the status of the program and comparing characteristics of schools participating in the school breakfast program with characteristics of nonparticipating schools.

To accomplish the second and third phases of the evaluation, the Service awarded $339,794 to Opinion Research Corporation in September 1977. Opinion Research with Colorado State University will assess the level of nutrients in a school breakfast, determine the plate waste in school breakfasts and lunches, compute food and labor costs, and examine the factors that affect student participation. The Service expects a report to be issued in mid-1980.

CONCLUSIONS

The Service's earlier school breakfast promotional program was not effective. Currently, the Service has a new effort going to inform school administrators and the public of all aspects of the breakfast program. It is too early to tell if this effort will be effective, but the Service has recognized the need to stay more directly involved in promoting the program.

CHAPTER 6

OVERALL CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

The Congress established the School Breakfast Program to provide help to students who are nutritionally needy; however, sufficient data or criteria have not been developed to determine which children are affected. The general assumption that all children from all low-income families are nutritionally needy has not been validated. It may be inaccurate and presumptuous to assume that parents with incomes below a certain level are unable to, and therefore do not, feed their children breakfast--especially in view of the other programs, such as the Food Stamp Program and the Aid to Families with Dependent Children Program, that are directed toward resolving the same problem.

Program cost can be a barrier to School Breakfast Program implementation or expansion that is not as readily solvable as some of the operational problems that exist. Also, participation in ongoing breakfast programs is in most cases low, especially in the junior and senior high schools. This is true even where sizeable numbers of students are eligible for free and reduced-price meals.

The Congress has declined to impose a Federal mandate for school breakfast programs but the question may come up again. We believe a Federal mandate would be inappropriate. We believe the Federal role should be one of ensuring that parents and school officials are made aware of the program, its goals, and the degree of support the Federal Government offers. We believe it is important to ensure that the community has a voice in deciding whether to provide or not provide a breakfast program. Routine periodic determinations of parents' interests concerning the School Breakfast Program by methods similar to those used in Hawaii and Florida would seem to provide the community a voice in the decisionmaking process.

With the passage of the Child Nutrition Amendments of 1975 in October 1975, the Congress emphasized the need for an information program to fully inform the public and school administrators about the program, but it is too early to tell if the Service's response will be effective.

RECOMMENDATIONS

To give parents the opportunity to participate in any decisions concerning the breakfast program, we recommend that the Secretary of Agriculture require that each school district, as part of its annual survey to determine which students qualify for free or reduced-price meals, or through other effective means, determine whether parents are interested in establishing a School Breakfast Program. The results should be made public and given to the local school governing body to help it in deciding whether to start a breakfast program.

We also recommend that the Secretary of Agriculture, in consultation with the Secretary of Health and Human Services, require that meaningful criteria be established and information gathered on the nutritional status of school children to provide a sounder basis for administering school food programs. This recommendation is not new, but is basically a restatement of recommendations made in our previous reports and in testimony before an appropriations subcommittee. Although the Departments of Agriculture and Health and Human Services agreed with our earlier recommendations on the need for nutritional status information to evaluate food assistance programs and have initiated studies, their efforts to formulate, coordinate, and implement a national nutrition intelligence system have not as yet produced any results.

Agriculture's award of a contract in September 1979 for an assessment of the effectiveness of the school breakfast and lunch programs on children's health is a good beginning. More information also is needed for evaluating the collective effect of all Federal food assistance programs on the nutritional status of Americans.

Also, Agriculture's problems with the validity of school district costs used as part of the basis for obtaining Federal reimbursement for school meal costs points up the importance of implementing long overdue corrective measures in this regard--especially in light of the budgetary adjustments being considered in Federal programs.

AGENCY COMMENTS AND OUR EVALUATION

The Department of Agriculture in commenting on our draft report did not respond to our recommendation that the Secretary require school districts to query parents to determine their interest in establishing a School Breakfast Program. We continue to believe that such direct communication at the local level will provide assurance that breakfast programs are initiated where they are wanted.

Although not responding directly to our second recommendation concerning the need for information on children's nutritional status to enable evaluations of the effectiveness of the food assistance programs, the Department stated that within the past year, the Service's Office of Policy, Planning and Evaluation had taken major steps to fill the research gaps regarding the school food programs. The Department believed we had not given sufficient recognition to these actions.

We are aware of the Department's ongoing research in addition to that mentioned on pages 11 and 12 of this report. These efforts relate to nutritional impact and focus on how a particular program affects nutritional status. The results of this work should be useful. We believe that more information also is needed about the collective impact of all food assistance programs on the nutritional status of children. Such information, we believe, is essential in determining whether additional programs are needed and the extent to which major expansion of an existing program, like the School Breakfast Program, should be pushed.

Currently, these determinations cannot be made because of the overall lack of information on the nutritional status of school-age children. The need for a national nutrition intelligence system has been recognized. But, until such a system starts providing information, it will not be possible to evaluate the overall effectiveness of food assistance programs.

The Department also commented on other specific issues. Its letter and our responses to these comments are in appendix I.

CHAPTER 7

SCOPE OF REVIEW

We made our review of the School Breakfast Program at the Federal, State, and local district levels. We reviewed legislation authorizing the program and implementing Agriculture regulations. In Washington, D.C., we visited the Department of Agriculture headquarters and discussed with Food and Nutrition Service officials the legislation, regulations, and Service policies and procedures for carrying out the program. We reviewed State plans and Service files and records related to various breakfast program planning, promotion, and administration matters. We visited the Service's regional offices in Chicago, Illinois; Atlanta, Georgia, San Francisco, California; and Robbinsville, New Jersey, to discuss regional policies and procedures and to review pertinent records on the operation of the program.

We visited State department of education food service divisions in Arizona, California, Michigan, Mississippi, New York, and Ohio and discussed with State officials their policies and procedures for administering the School Breakfast Program and any problems encountered in expanding the program. We also reviewed program participation and cost records and other pertinent documents to determine the rate of program expansion in each State and to identify problems inhibiting expansion. In addition, we obtained information from cognizant Service regional offices concerning certain practices in the States of Hawaii and Florida. Although these two States were not included in our detailed review, we obtained information from available reports and from State of Florida education officials that was pertinent to our inquiries about involving the community in School Breakfast Program decisions.

To inquire into why some school districts do not have a program and how others are dealing with problems in increasing participation in their programs and expanding to other schools, we visited the 29 school districts listed on the next page and reviewed district records and talked to school administrators, food service personnel, principals, teachers, Parent Teachers Association officials, and students. We also talked to some parents in the school districts. We did not include any residential schools, private schools, or day care centers in our review.

School district	Date School Breakfast Program started
Mississippi	
Jackson	September 1976
Biloxi	September 1968
Hattiesburg	No program
Greenville	No program
Ohio	
Cleveland	January 1968
Gallia County	January 1977
Lorain	September 1968
Wadsworth	January 1973
Central Local	No program
Parma	No program
California	
Emery	September 1973
Long Beach	October 1972
Compton	No program
Jamul-Las Flores Union	No program
Arizona	
Apache Junction	August 1978
Bisbee	October 1976
Tucson	September 1971
Littleton	No program
Paradise Valley	No program
New York	
Corning	September 1970
New York City No. 2	September 1970
New York City No. 18	September 1978
New York City No. 78	September 1976
Cortland	No program
Utica	No program
Michigan	
Baldwin Community	September 1964
Detroit	March 1967
Grand Rapids	No program
Williamston	No program

Although the review results at our selected locations cannot be projected nationwide, we chose the States on the basis of obtaining wide geographic coverage. Within States, we selected varying size school districts and included districts with and without breakfast programs.

In addition, we scanned the Children's Foundation report entitled "Barriers to School Breakfast" and discussed it with a Foundation official. We also reviewed studies made in the States of Washington, Michigan, Massachusetts, and Minnesota and analyzed data from questionnaires the Service obtained from selected schools.

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD AND NUTRITION SERVICE

Washington, D.C. 20250

Jan. 2, 1980

Mr. Henry Eschwege
Director, Community and
Economic Development Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Eschwege

The GAO draft report "Major Factors Inhibit Expansion of the School Breakfast Program" offers a useful discussion of school breakfast expansion issues. There are several aspects of the report that we believe warrant comment, however.

Information from past studies and plans for future studies

In the cover summary, the GAO states, "The lack of information on the nutritional status of children makes it impractical to determine the need for a specific nutritional assistance program like the school breakfast program."

Studies such as the 10 State Nutrition Survey, the Nationwide Food Consumption Survey and the Health and Nutrition Examination Survey (HANES) have provided a substantial body of knowledge concerning the nutritional status of children. These studies have helped to establish the need for nutrition intervention programs, such as the school breakfast program. Indeed, analysis of HANES data by G. William Hoagland of the Congressional Budget Office suggests that the school breakfast program is instrumental in improving the dietary intake of children. We think GAO should acknowledge the existence and utility of those studies.

[GAO COMMENT: We are aware of the studies cited above and have discussed them at length in our earlier reports, some of which are cited on pages 10 and 11 of this report. While these studies formed the bases for nutrition intervention programs for low-income persons, followon efforts have not provided adequate information to allow judgments to be made about the nutritional status of children today. The cited study by G. William Hoagland

showed that breakfast participants increased their intakes of some nutrients. But his report also stated that factors such as age, sex, region, and family head's education had more impact on nutritional status than income. The study indicated that when such factors are controlled, income generally was insignificant in explaining individual nutrient intake as a proportion of recommended dietary allowances. In total, enough information is not available to determine which nutrition programs have been effective and whether all of them are needed.]

The GAO report also remarks that output from improved nutritional information systems "is still years away". However, while a complete new system may be some years off, major pieces of the system are now being put in place. The Nationwide Food Consumption Study, as well as studies being conducted in response to Senate Resolution 90 and other Congressional directives will provide important information on the nutritional impacts of the school lunch and breakfast programs. Information on participant dietary intake, nutritional status, and health; and on school lunch and breakfast costs will be available within 12 - 24 months. Results from these studies will represent major components of any new nutrition information system. Within the past year, the Policy, Planning and Evaluation office of FNS [the Food and Nutrition Service] has taken major steps to fill the research gaps regarding the school food programs.

Not all of this new research work appears to have been taken into account by GAO when it discusses research now in progress. Moreover, the GAO refers to the studies being done in response to Senate Resolution 90 with the statement: "This effort may be a beginning, but much more needs to be done...." We think that the GAO's treatment of this area does not sufficiently take into account the substantial new research efforts now under way. Also, we would prefer to hear any specific, constructive criticism GAO has of our current research efforts rather than the vague statement that "much more needs to be done".

[GAO COMMENT: This is discussed on pages 39 and 40.]

Nutritional need and economic need

GAO questions the targeting of the SBP [School Breakfast Program] to nutritionally needy areas or schools and questions the link between nutritional and economic need. GAO also contends that because a child is economically needy, he or she is not "automatically" nutritionally needy.

A decade ago, reports from the Field Foundation and the Ten State Nutrition Survey found significant malnutrition in economically needy areas. In addition, while each economically needy person is not necessarily undernourished, major nutritional studies have established a general relationship between economic need and nutritional problems such as anemia, dental caries, obesity, etc. For these reasons, we think the GAO discussion of this issue is incomplete. The GAO should take note of studies that have found relationships between poor areas and higher incidences of nutrition problems, as well as between poor individuals and higher incidences of these problems.

> [GAO COMMENT: Our report does not question targeting the School Breakfast Program to the nutritionally needy. Our concern is that the nutritionally needy have not been identified in today's environment. The nutrition-related problems of the economically needy cited in the reports of a decade ago resulted in major Federal nutritional assistance programs. However, information for currently evaluating the impact of these programs on the nutritional problems of the poor has not been sufficiently developed. As stated on pages 10-12 of our report, answers are not available about whether Federal welfare and food programs provide sufficient resources to low-income families and whether low-income families should continue to be automatically considered nutritionally needy.]

Moreover, under current law, the School Breakfast Program is available, to any school that wishes to participate in the program, whether the school is located in a poor area or not. The only differentiation between needy and non-needy schools concerns the use of "severe need" reimbursement rates. (Public Law 95-627 expressed Congress' intent to make these rates available to schools with high concentrations of economically needy children. Section 6(c) of P.L. 95-627 requires States to make the severe need rates available to schools that in the second preceding school year served 40

percent or more of their school lunches free or at a reduced price. As the draft report points out, State agencies may certify other schools whose costs cannot be covered by regular breakfast reimbursement rates as being in severe need if they meet certain criteria established by the State.)

[GAO COMMENT: We are not questioning the current legislation that offers School Breakfast Program assistance to any school district wishing to participate in the program. However, such legislation emphasizes the need for programs in schools where students are nutritionally needy--generally defined in terms of low family income. Also, the several State mandates that have been established are all directed toward children who are eligible for free and reduced-price meals because of low-income status. Considering the various food assistance programs and the absence of hard data to support the broad assumption that children of low-income families continue to be automatically nutritionally needy and therefore need the breakfast program, we believe the breakfast program should remain a voluntary program.]

GAO's Methodology

We would be interested in knowing more about attitude surveys conducted in Utica and Grand Rapids. More specifically, what questions were asked of whom, and what were the sample sizes of the two surveys and the sampling methodology used. In any case, we believe it is not appropriate to generalize about parental attitudes based on survey results in two communities. Statements such as "The Grand Rapids survey is indicative of the varying opinions about parental responsibility and the school breakfast program" do not seem warranted. Similarly, we question how GAO can state that "parents interviewed in Utica state that parents are responsible for feeding their children and that having the school breakfast could destroy this sense of responsibility in both the parent and child." How many parents in Utica stated that and how were they selected? Also, is one school principal's opinion of any particular significance in a report about a national program that operates in over 30,000 schools?

While we do not know how many high school principals GAO talked with, we question whether the data GAO collected would support the general statement, "The principals believed the school breakfast program would not be successful in secondary schools because of low student participation."

[GAO COMMENT: We recognize that the information obtained from the 29 school districts we reviewed does not provide a basis for nationally quantifying the degree of acceptance or nonacceptance of the School Breakfast Program. However, it is significant that the results of not only the Grand Rapids survey and our review but also the Service's survey discussed on page 4 of this report are remarkably consistent in showing the attitudes or convictions that have slowed expansion of the breakfast program. The specific comments of selected parents and officials are reported to exemplify the type of attitudes that are included in the overall data.]

Further, GAO's contention on page 26 that "Consequently, most students, their parents and some district staff may be inconvenienced or incur hardships because of changes to bus or class schedules" is not supported. In many schools busing schedules have been arranged to accommodate the SBP without inconveniencing many students. Other schools have been able to serve breakfasts in class just after the start of school and not rearrange the bus schedule at all. Elsewhere in the report, GAO says that barriers can be overcome while here it seems to imply that inconvenience is inevitable.*

We believe the report should be modified so as not to give the impression that inconvenience to students, parents and

---

*In testimony before the House Committee on Education and Labor on November 27, 1979, the superintendent of schools for the Northern Bedford County School District in Pennsylvania stated: "As a school administrator who has experienced the scheduling of the breakfast service, I can attest to the ease by which it operates. A reduced staff of the regular school lunch cooks arrives an hour early to prepare and serve the breakfast. The pupils unload from their buses and move on their own, without supervision to the cafeteria...and then to their homeroom or first period class as the principal has planned, without confusion. Minimal clerical work involved is handled by a building secretary stationed on the line also without complications. I state these...observations simply to negate many of the objections made by fellow administrators. It is not a complicated program to operate. It is very simple."

local officials inevitably accompanies initiation of the School Breakfast Program in a school district. In many school districts, operational problems may not be intrinsic to the program but rather stem from the way the program is managed. For example, the discussion of busing on pages 26 and 27 includes a statement that "whether busing problems can be resolved appears to depend on the willingness of district officials, parents and students to accept being inconvenienced". Feasible solutions to busing problems are available. Some schools have served breakfasts during a homeroom or activity period after the school day begins. Others have served breakfast as part of a "morning break". A school district in each of two western States has begun researching the possibility of serving breakfast on the bus.

The dratt report also acknowledges (on page 26) that operational problems appear solvable if cost problems can be resolved. Therefore, we believe the principal focus should be on cost issues.

> [GAO COMMENT: We see no inconsistency in reporting that barriers to operating breakfast programs can be resolved and at the same time recognizing that inconveniences will occur from changes made in daily routines. The question of inconvenience is basically one of degree and that depends on the values assigned by the affected individuals to the changes in routines. We do not think the report overstates the inconveniences that may arise with the initiation of a breakfast program. Our report recognizes that many changes have been accepted in school districts with ongoing breakfast programs. We cite this information to illustrate the two sides of the question. This in no way diminishes the importance of the cost issue which is a major focus of our report.]

Breakfast Costs

Throughout the report GAO contends that low participation in the SBP is a significant obstacle to program growth and contributes to high costs. However, GAO does not consider that low participation may not be a result of the program per se, but rather of the way it is being managed in a particular school or school district. The example on page 28 of the New York City School that increased program participation from 25 to 369 students per day simply by moving the serving area

supports the need for local school officials to be innovative in their administration of the SBP rather than dropping out because of low participation.

> [GAO COMMENT: We agree that ways may be found to increase participation of students in ongoing breakfast programs. However, increasing participation of secondary school students is not an easy task. Although the example of the New York City senior high school cited above shows some increase in participation, only 2 percent of the city's senior high school students participated in the breakfast program in school year 1977-78. It is clear that low participation, especially in secondary schools, is a major factor in a school district's decision as to whether a School Breakfast Program is warranted.]

Moreover, GAO's cost analysis is based on a limited and non-representative sample of schools. The results are presented without appropriate caveats about the non-generalizable nature of the data. GAO did not attempt to standardize the cost data that were collected from the various school districts. GAO drew its information from school and state records. GAO cites high labor, indirect cost, equipment, and other non-food costs. There are several caveats that should be mentioned about this method of collection and analysis of cost data. The Department's cost-based accountability regulations require school food authorities to allocate their costs between reimbursable and non-reimbursable programs and within reimbursement programs, among the NSLP [National School Lunch Program], SBP, and SMP [Special Milk Program]. However, these requirements are widely interpreted and a range of practices are used to develop the allocation of costs in submitting reimbursement vouchers. This often results in costs which are not comparable among districts and which may represent different categories of costs more or less accurately. Some of the more troublesome categories to allocate are direct labor, equipment, and indirect costs. GAO did not attempt to verify or standardize the costing procedures within schools or school districts. The Department recognizes the desirability of developing an accurate or at least standard framework for measuring costs in the SBP and other CN [Child Nutrition] programs. To that end, as part of its study of menu choice and equipment, the Department is also systematically gathering cost information on a nationally representative sample of schools. Information from this study will be available in late 1980 and 1981.

[GAO COMMENT: We recognize that cost data collection systems vary widely between school districts, and consequently we made no attempt to compare individual cost categories between school districts. Our purpose was to show that some districts incurred costs exceeding reimbursements --which made cost a factor in deciding whether to expand or continue breakfast programs. Data on the school districts we selected, although not statistically projectable to all schools nationwide, indicates that a large number of school districts are required to contribute local funds for their breakfast programs. Some of these districts will decide to have programs and others will not, and some will expand their programs and others will not, depending on their willingness to commit local funds. In this regard, we see no reason to question the appropriateness of using cost data obtained from school district and State records to show a particular district's financial concerns. These same costs are part of the basis for obtaining Federal reimbursement for breakfast program costs. If the Service is unsure of the validity of these costs, it should, of course, take action to resolve any questions within its reimbursement procedures and process.]

We also believe that GAO's discussion (page 23) of two USDA studies of the relationship between prices charged for school breakfasts and participation in the SBP is inconclusive. In schools where very few paying students participate in the SBP a 13 percent drop-out of paying students due to a 10 cent price increase would not significantly reduce overall program participation. For example using Corning, NY as an example, if 13 percent of the paying students ceased participation as a result of a 10 cent price increase, the net loss in overall participation would be only 3.5% since only 27 percent of the breakfasts are "paid."

[GAO COMMENT: The Agriculture studies cited on page 23 of our report indicated loss of participation in school lunch and breakfast programs when prices to paying students were increased. In its comments, the Service tries to minimize the importance of this loss of participation. The Service's computations are incorrect because the 13-percent dropout rate cited above refers to total school breakfast participation, not just paying student participation.

In this specific study, 31 percent of paying students dropped out of the School Breakfast Program after the price was increased 10 cents. The loss of participation indicated from the two studies supports the basis for concern expressed by the Corning Food Director.]

Further, there seems to be no conclusive correlation between high paid participation and low unit cost in the sample of school districts to which the data in appendix V pertain. For example Wadsworth, Ohio had the highest percentage of paid breakfasts served (55 percent) but Jackson, Mississippi, with only 7 percent paid participation, reported the lowest unit cost. The point is that we are concerned that other factors affecting unit cost are not adequately presented in the draft report. In the case of the two school districts cited above, for example, the lower unit cost reported by Jackson, Mississippi could have been attributable to the school district's location in an area where all costs are generally lower, rather than to any impact of participation by paying students. Also, the draft report does not treat the question of what type of breakfast each school district was serving. Some districts have served elaborate breakfasts far exceeding the minimum requirements that must be met in order to make the breakfasts reimbursable. This extra effort generates higher food and labor costs. Such districts may be able to reduce their costs by serving simpler breakfasts.

[GAO COMMENT: Our report does not make a point that a correlation exists between high paid participation and low unit cost between districts. Consequently, the issues of different cost levels and different types of breakfasts served by different districts are not pertinent. Moreover, the Food and Nutrition Service's example about the lack of conclusive correlation between high paid participation and low unit cost by comparing different districts is inappropriate because of differences in wage rates, food costs, etc. Any such correlation is properly applicable only to an individual district. For example, increased participation (either paid or free) in a district should tend to push the cost per breakfast down because fixed program costs would be spread over more meals. Conversely, the cost per breakfast tends to go up if the same fixed costs are spread over fewer meals.]

Financial Incentives

Section 6(b) of Public Law 95-627 (enacted November 10, 1978) provided financial incentives for school districts to start breakfast programs. These are not recognized in the draft report. Section 5 of the Child Nutrition Act of 1966 was amended to provide assistance under the Food Service Equipment Assistance Program (FSEAP) to schools desiring to commence operation of the School Breakfast Program. State agencies are now required to include among the categories of schools to whose needs they must give priority in allocating unreserved FSEAP funds "schools that do not serve both breakfasts and lunches but that will use food service equipment to initiate the service of breakfasts or lunches." P.L. 95-627 also added this category of schools to those which are eligible for reserved FSEAP funds. Thus, schools operating only one of the programs will be assisted to expand their operations to the other. Since the National School Lunch Program is already pervasive in schools, expansion spurred by this amendment will be primarily in the School Breakfast Program.

[GAO COMMENT: The legislation cited above continues a program of making food preparation equipment available to schools without a food service program. This is not a new program although some language changes have been made and the funding has been increased. The Service contends that the program will primarily benefit expansion of the breakfast program since most schools already have the capability to serve lunches. It seems likely, however, that the program will primarily help those schools with no food programs since those that already have lunch programs generally can provide breakfasts without additional equipment. Because most schools presently provide lunch programs, the equipment assistance program may have the potential for only limited impact on breakfast program expansion.]

Outreach efforts

We are concerned also about the statements on pages 33 and 34 to the effect that few of the outreach efforts authorized by P.L. 94-105 (enacted October 7, 1975) were ever carried out. All such actions prescribed for implementation by this Agency have long since been completed.

[GAO COMMENT: The statements on pages 33 and 34 refer to the combined efforts of Agriculture and the States. The Food and Nutrition Service developed promotional material which was distributed to State agencies and also approved State promotion plans. But only one of the six States we reviewed made significant efforts to promote the program at the school district level. In the other five States, we found only limited use of the materials and the plans were not fully carried out. The Service should have made greater efforts to assure that State agencies fulfilled their promotion plans.]

We also believe the information presented in Chapter 5 concerning our current outreach efforts is too sketchy and downplays the effort this Agency is currently putting into promoting the expansion of the School Breakfast Program. Consequently, a more detailed description of our activities in this area is presented below.

During 1979 FNS has done the following things to promote and expand the School Breakfast Program:

1. Breakfast grants:

   Six grants totaling more than $230,000 were awarded to non-profit organizations in Utah, Vermont, Ohio, Wisconsin, Oregon and Alabama to conduct Statewide campaigns between October 1979 and December 1980 to expand knowledge of and participation in the School Breakfast Program.

2. PTA Cooperative Agreement:

   In April 1979, the National PTA and FNS entered into a cooperative agreement for the purpose of fostering the participation of State and local PTAs in the development and monitoring of local school food programs. Although the primary purpose of the cooperative agreement was to encourage parental involvement in the lunch program in 20 selected States, four of the States selected for participation in this project also chose to work on expanding and improving the School Breakfast Program. The four States are Oregon, Georgia, North Carolina and Oklahoma.

3. Selected States and outreach projects:

In the spring of 1979 each Regional Office selected at least one State for special outreach efforts. In all 19 States were targeted. FNS Regional Offices are now involved in a wide range of ongoing activities in these States, including:

-public information campaigns.

-presentations at Statewide conferences of school officials.

-development of breakfast materials.

-cooperation with advocacy groups in conducting outreach.

-assistance in conducting feasibility studies.

-formation of Statewide steering committees for breakfast expansion.

4. Title 1 Breakfast Expansion Efforts:

Public Law 95-561, the 1978 Amendments to Title 1 of the Elementary and Secondary Education Act of 1965, offers several opportunities for encouraging Title 1 schools to start breakfast programs. Recognizing this, FNS has, through its Regional Offices, presented testimony to HEW's Office of Education at public hearings on the regulations implementing this law and has submitted written comments on these regulations to HEW's Office of Education. FNS, in conjunction with the Children's Foundation, has also petitioned HEW's Office of Education to provide school breakfast training and information to State Title 1 coordinators and members of local parent advisory councils at 5 Regional meetings to be conducted by HEW's Office of Education between February and June 1980.

5. Public Information Activities

-FNS has developed a catalogue of breakfast materials available from FNS National and Regional Offices, State educational agencies, advocacy groups and industry; copies of the catalogue are now being distributed.

APPENDIX I

-A new school breakfast brochure, Breakfast And School-A-Good Combination, has been developed and is expected to be available for distribution early next year.

-Numerous breakfast articles have been published in Food and Nutrition (FNS' bi-monthly magazine); articles from the June and October issues have been reprinted for distribution to school officials and the general public.

-The cooperation and assistance of governmental and community agencies and professional associations as well as representatives of the food industry in promoting the breakfast program have been solicited through letters, telephone requests and personal visits.

-Publication and development of school breakfast articles in national journals and newsletters have been solicited; Working Mother Magazine published a school breakfast piece in its November 1979 issue at the Department's solicitation.

-30-second radio public service announcements using famous entertainers and athletes have been developed and distributed throughout the country.

-A 15-second and a 30-second TV public service announcement have also been developed and distributed throughout the country.

-Exhibits focusing on the breakfast program have been manned at the following national conventions:

  -The American Association of School Administrators, February 19, 1979;

  -National Association of Elementary School Principals, March 1979;

  -National PTA, June 1979; and

  -American School Food Service Association, July/August 1979.

-Slide shows and video tapes on school breakfasts have been acquired and reproduced for Regional Office use.

[GAO COMMENT: We have added a statement on page 37 to refer the reader to these specific Agriculture comments. However, as noted in our conclusions, on the same page, it is still too early to tell whether such actions are effective in getting information to the people at the local level.]

Additional points

1. In both the digest and main report GAO refers to its earlier "Federal Domestic Food Assistance Programs--A Time for Assessment and Change", as showing that existing food program legislation could theoretically result in some families receiving as much as 230 percent of the cost of the Thrifty Food Plan. Our comments on that GAO report discussed what we regard as a number of methodological and analytical problems with the GAO analysis. We also observed that the only categories of people eligible to receive multiple food program benefits are children, pregnant and postpartum women and the elderly groups that have been found in major nutritional surveys to be most likely to suffer nutritional deficiencies. Finally, the Department has advanced several legislative proposals to reduce participation in multiple programs.

[GAO COMMENT: We cite the above-mentioned GAO report to stress the basic point that the Department does not know the impact of the various nutrition assistance programs on low-income families and that the possibility of overlapping programs, especially for children, is very real. The Service appears to agree with this since its comments indicate that it has advanced legislative proposals to reduce participation in multiple programs.]

2. The discussion on pages ii and iii concerning States with legislatively mandated breakfast programs closes with a statement that some States are weakening or reconsidering their mandates because of the problems encountered. We believe this is somewhat overstated. No State that passed authorizing legislation mandating the program has weakened or rescinded its mandate. We are aware that Massachusetts recently rescinded its School Breakfast Program mandate. However,

the Massachusetts mandate was somewhat unique in that it had never been legislated. Rather, it was an administrative directive issued by the State Board of Education which was subsequently overriden by the legislature. In States with legislatively mandated programs, on the other hand, efforts to overturn the State mandates are now generally going down to defeat. Efforts to repeal legislated School Breakfast Program mandates in Michigan and Texas were defeated. Mandates also remain in place in Ohio and New York. In addition, efforts to induce State legislatures to enact School Breakfast Program mandates have been initiated in Illinois, Florida, Mississippi, Maine, Wisconsin, Alabama, and New Mexico.*

[GAO COMMENT: We believe that the question of whether the mandates are administrative or legislative is not pertinent to the discussion in our report. We point out that some States are weakening or reconsidering their mandates. South Carolina failed to renew its mandate and Massachusetts weakened its mandate. The Community Nutrition Institute's August 9, 1979, Weekly Report noted that several statewide groups proposing mandates watched them die in their legislatures. Also, the report noted that advocates had struggled hard to prevent lawmakers from reversing or whittling away at mandates already in place. We recognize that this has been and probably will be a continuing effort by those for as well as those opposed to a mandate.]

3. We think some context needs to be added to GAO's discussion of schools dropping out of the program. As now written, some readers could wonder whether the SBP has not been declining rather than growing. Of course, as the chart below indicates, the SBP has been growing substantially in recent

---

*We recognize that South Carolina may also be cited as a State that had a mandate and then dropped it. However, South Carolina never passed authorizing legislation mandating the breakfast program. Rather, there was simply some language in an annual appropriations bill which appeared to mandate the program, but which was not widely implemented or enforced. Subsequent appropriations bills did not contain this language.

years both in terms of the number of schools and students participating.

Fiscal Year	# of Schools	# of Students
1973	14,277	1,992,900
1976	16,835	2,333,600
1977	21,940	2,605,500
1978	24,607	2,809,220
1979	30,971	3,249,172

Although some schools have dropped out, the number of such schools is small compared to those remaining in the program or newly entering the program.

4. Finally, we would suggest two minor wording changes in the report. We suggest that the first sentence of paragraph three on page ii refer to "attempts to use them to take over what they regard as the duties of the parents and other family members." On page 5, we suggest that the last sentence of the second paragraph state: "The issue is: Should breakfast nutrition needs be met only by the home or also by the school?"

[GAO COMMENT: The Digest has been revised on page ii. We believe the other suggested change is not needed.]

Sincerely,

/S/

ROBERT GREENSTEIN
Administrator

[GAO NOTE: The Department's letter was retyped to facilitate showing our comments. The page numbers were revised to correspond to the page numbers in this report. Also the Department did not respond directly to the recommendations included in our report. This is discussed on pages 39 and 40 of this report.]

APPENDIX II

MAXIMUM FEDERAL PAYMENTS PER BREAKFAST FOR THE SCHOOL BREAKFAST PROGRAM

Period	Regular breakfast			Especially needy breakfast	
	Free	Reduced price	Paid	Free	Reduced price
	(cents)				
July 1 - Dec. 31, 1977	39.95	32.25	11.25	45.00	40.00
Jan. 1 - June 30, 1978	40.25	33.25	11.50	50.25	45.25
July 1 - Dec. 31, 1978	42.25	34.75	12.00	52.25	47.25
Jan. 1 - June 30, 1979	44.50	36.50	12.75	54.50	49.50
July 1 - Dec. 31, 1979	47.25	39.00	13.50	57.25	52.25
Jan. 1 - June 30, 1980	49.25	40.50	14.00	59.50	54.50

APPENDIX III

OCTOBER 1978 FOOD SERVICE PROFILE OF SCHOOL DISTRICTS VISITED

School district	Total enrollment	Average daily attendance	Number of schools in		
			District	Breakfast program	Lunch program
Arizona:					
Apache Junction	1,980	1,868	4	4	4
Bisbee	1,587	1,535	3	3	3
Littleton	1,290	1,227	2	0	2
Paradise Valley	16,811	14,659	16	0	14
Tucson	55,333	52,566	99	21	99
California:					
Compton	29,984	29,307	36	0	36
Emery	556	519	3	3	3
Jamul-Las Flores Union	646	640	2	0	2
Long Beach	55,851	54,630	77	16	77
Michigan:					
Baldwin Community	939	893	5	4	5
Detroit	223,335	201,002	302	46	302
Grand Rapids	24,784	22,305	68	0	68
Williamston	1,814	a/ 1,814	4	0	4
Mississippi:					
Biloxi	7,219	6,680	11	11	11
Greenville	9,289	8,851	18	0	18
Hattiesburg	5,928	5,640	15	0	15
Jackson	32,278	29,928	54	32	54
New York:					
Corning	6,630	6,401	17	8	17
Cortland	3,568	3,378	7	0	7
New York City					
No. 2	19,737	15,237	29	26	26
No. 18	14,384	12,093	18	18	18
No. 78	293,106	236,692	122	121	122
Utica	11,934	10,633	20	0	20
Ohio:					
Central Local	1,740	1,653	5	0	5
Cleveland	108,543	100,141	173	53	171
Gallia County	3,453	3,180	11	10	11
Lorain	14,693	13,063	20	9	20
Parma	18,308	15,841	27	0	27
Wadsworth	4,548	4,227	7	3	7

a/Average daily attendance not recorded; instead the district uses the statistics from the actual count on the 4th Friday in September.

APPENDIX IV

COMPARISON OF RATE OF STUDENT PARTICIPATION IN THE BREAKFAST PROGRAM WITH PARTICIPATION IN LUNCH PROGRAM FOR SCHOOL YEAR 1977-78

School district	Elementary school		Junior high school		Senior high school	
	Breakfast	Lunch	Breakfast	Lunch	Breakfast	Lunch
	(percent)					
Arizona:						
Bisbee	(a)	60	27	70	29	53
Tucson	43	72	12	40	(a)	23
California:						
Emery	38	93	(b)	(b)	15	23
Long Beach	32	64	(a)	47	(a)	21
Michigan:						
Baldwin Community	77	96	(a)	(b)	(a)	78
Detroit	34	57	(a)	42	(a)	41
Mississippi:						
Biloxi	39	85	24	62	11	46
Jackson	59	93	(a)	71	(a)	65
New York:						
Corning	12	70	5	66	3	42
New York City						
No. 2	48	66	25	45	(c)	(c)
No. 78	(c)	(c)	(c)	(c)	2	35
Ohio:						
Cleveland	76	75	(a)	(b)	(a)	46
Gallia County	29	67	(b)	(b)	6	83
Lorain	43	79	7	35	0.2	52
Wadsworth	50	55	(a)	18	5	29

a/Breakfast program not provided.

b/Figures for all secondary schools are combined and listed under senior high school.

c/New York City senior high schools are in one separate district, New York City No. 78.

APPENDIX V

SCHOOL DISTRICTS' BREAKFAST PROGRAM COSTS,

REVENUES, AND NUMBER OF BREAKFASTS SERVED FOR SCHOOL YEAR 1977-78 (note a)

	Mississippi		Ohio				Michigan		California		Arizona		New York (note c)		
Cost category	Jackson	Biloxi	Cleveland	Gallia County	Lorain	Wadsworth	Detroit	Baldwin Community	Long Beach	Emery (note b)	Tucson	Eisbee	Corning	New York City No. 2	New York City No. 78
Food and milk	$0.2174	$0.2486	$ 0.2790	$ 0.2860	$ 0.2620	$ 0.2040	$0.2466	$ 0.2471	$ 0.2576	$ 0.3034	$ 0.1640	$ 0.1775	$ 0.2435	$0.3500	$ 0.2599
Nonfood items	0	0	.0372	.0220	.0200	.0170	0	0	0	0	0	0	0	0	0
Labor and related costs	.0710	.0557	.1860	.1200	.0390	.1320	.0917	.1491	.2881	.5573	.2240	.1296	.3675	.1280	.2927
Purchased services	0	0	0	0	0	0	0	0	.0553	0	.0372	.0604	0	0	0
Equipment	0	0	0	0	0	0	0	0	.0067	0	.0234	0	0	0	0
Indirect costs	.0066	.0138	.0032	.0825	.0070	.0518	.0392	.1128	0	0	.0846	.0773	0	0	0
Total	.2950	.3181	.5054	.5109	.3280	.4048	.3775	.5090	.6077	.8607	.5332	.4448	.6310	.4780	.5526
Revenues															
Federal	.2825	.2866	.4498	.3231	.2841	.1894	.4368	.4444	.4704	.3481	.3583	.2573	.3752	.3975	.4425
State	0	0	0	0	0	0	0	0	.0614	.0602	0	0	.0532	.0805	.0540
Student and other participants	.0125	.0315	.0099	.0740	.0238	.1224	.0132	.0057	.0137	.0380	.0070	.0923	.0613	0	.0109
Total	.2950	.3181	.4597	.3971	.3079	.3118	.4500	.4501	.5455	.4463	.4053	.3496	.4897	.4780	.5074
Net gain or (loss)	$ 0	$ 0	$(0.0457)	$(0.1138)	$(0.0201)	$(0.0930)	d/$0.0725	$(0.0589)	$(0.0622)	$(0.4144)	$(0.1279)	$(0.0952)	$(0.1413)	$ 0	$(0.0452)
Breakfasts served															
Free	345,997	253,231	2,831,824	63,717	276,064	10,743	1,390,519	55,859	558,975	20,549	310,906	22,196	48,519	1,306,351	874,686
Percent	89	76	93	69	82	38	99	95	91	76	95	61	67	100	95
Reduced price	15,564	29,575	113,634	4,606	25,679	1,814	228	1,355	35,873	2,358	8,695	551	4,497	-	20,120
Percent	4	9	4	5	8	7	0	2	6	9	3	2	6	-	2
Paid	27,205	50,285	101,987	23,561	33,365	15,583	13,710	1,793	19,785	4,283	5,542	13,545	19,731	-	25,739
Percent	7	15	3	26	10	55	1	3	3	15	2	37	27	-	3
Total	388,766	333,091	3,047,445	91,884	335,108	28,140	1,404,457	59,007	614,633	27,190	325,143	36,292	72,747	1,306,351	920,545
Percent	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100

a/The figures shown were taken from State and district cost reports that were used by the States to compute Federal and State reimbursements.

b/The Emery School District only maintained cost records reflecting costs in two categories--food and related costs and labor and related costs.

c/New York State only requires districts to accumulate costs in two categories--food and milk costs and labor and miscellaneous costs.

d/Michigan uses a manual system to compute district revenues. At the time of our review, the State had not determined the amount of revenue to be provided to the Detroit School District for school year 1977-78. The district had received advance payments in excess of costs resulting in the $0.0725 per meal surplus shown above. An adjustment will be made to eliminate this surplus when the State receives the district's last two quarterly reports for school year 1977-78.

76

77

SCHOOL BREAKFAST PROGRAM GROWTH FROM OCTOBER 1976 THROUGH OCTOBER 1978

Breakfast program school district	Schools in district October 1978	Schools in breakfast program October 1976	October 1977	October 1978	Expansion achieved
Arizona:					
Apache Junction	4	0	0	4	4
Bisbee	3	1	1	3	2
Tucson	99	19	21	21	2
California:					
Emery	3	3	3	3	N/A
Long Beach	77	12	16	16	4
Michigan:					
Baldwin Community	5	3	3	4	1
Detroit	302	7	43	46	39
Mississippi:					
Biloxi	11	12	12	11	a/ (1)
Jackson	54	7	10	32	25
New York:					
Corning (note b)	17	14	14	c/ 8	c/ (6)
New York City					
No. 2 (note b)	29	24	26	26	2
No. 18 (note b)	18	0	0	18	18
No. 78 (note b)	122	1	101	121	120
Ohio:					
Cleveland (note b)	173	55	55	53	d/ (2)
Gallia County	11	0	10	10	10
Lorain (note b)	20	6	9	9	3
Wadsworth	8	1	2	3	2

a/School closed because of declining enrollment.

b/Districts where all or some schools are mandated by the State to provide breakfast programs.

c/Two schools were added to the breakfast program in December 1977; eight schools discontinued the program at the beginning of school year 1978-79 because the program was losing money.

d/Schools closed because of financial and desegregation problems.

(023960)

U.S. GOVERNMENT PRINTING OFFICE : 1980-620-386/174